

Index Sheet

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February 15, 2013

Mr. John L. Hopkins
President
Medtech Institute
4501 Circle 75 Parkway
Suite D-4280
Atlanta, Georgia 30339

UPS Tracking Number
1ZA5467Y0196182841

RE: **Final Program Review Determination**
OPE ID: 03804400
PRCN: 2012-2-04-27832

Dear Mr. Hopkins:

The U.S. Department of Education's (Department's) School Participation Division – Atlanta issued a Program Review Report on June 14, 2012 covering Medtech Institute's (MI's) administration of programs authorized by Title IV of the Higher Education Act of 1965, as amended, 20 U.S.C. §§ 1070 et seq. (Title IV, HEA programs), for the 2010-2011 and 2011-2012 award years. MI's final response was received on October 18, 2012. A copy of the Program Review Report (and related attachments) and MI's response are attached. Any supporting documentation submitted with the response is being retained by the Department and is available for inspection by CBC upon request. Additionally, this Final Program Review Determination Letter (FPRD), related attachments, and any supporting documentation may be subject to release under the Freedom of Information Act (FOIA) and can be provided to other oversight entities after this FPRD is issued.

Purpose:

Final determinations have been made concerning all of the outstanding findings of the program review report. The purpose of this letter is to: (1) identify liabilities resulting from the findings of this program review report, (2) provide instructions for payment of liabilities to the Department, (3) notify the institution of its right to appeal and (4) close the review.

The total liabilities due from the institution from this program review are \$20,590.00. This FPRD contains detailed information about the liability determination for all findings.

Protection of Personally Identifiable Information (PII):

PII is any information about an individual which can be used to distinguish or trace an individual's identity (some examples are name, social security number, date and place of birth). The loss of PII can result in substantial harm, embarrassment, and inconvenience to individuals and may lead to identity theft or other fraudulent use of the information. To protect PII, the

Federal Student Aid
AN OFFICE OF THE U.S. DEPARTMENT OF EDUCATION

School Participation Division – Atlanta
61 Forsyth Street, Room 18T40
Atlanta, Georgia 30303-8918
www.FederalStudentAid.gov

findings in the attached report do not contain any student PII. Instead, the findings reference students only by a student number created by Federal Student Aid. The student numbers were assigned in Appendix A, Student Sample.

Appeal Procedures:

This constitutes the Department's FPRD with respect to the liabilities identified from the June 14, 2012 program review report. If MI wishes to appeal to the Secretary for a review of monetary liabilities established by the FPRD, the institution must file a written request for an administrative hearing. The Department must receive the request no later than 45 days from the date MI receives this FPRD. An original and four copies of the information MI submits must be attached to the request. The request for an appeal must be sent to:

Ms. Mary E. Gust, Director
Administrative Actions and Appeals Service Group
U.S. Department of Education
Federal Student Aid/PC
830 First Street, NE - UCP3, Room 84F2
Washington, DC 20002-8019

MI's appeal request must:

- (1) indicate the findings, issues and facts being disputed;
- (2) state the institution's position, together with pertinent facts and reasons supporting its position;
- (3) include all documentation it believes the Department should consider in support of the appeal. An institution may provide detailed liability information from a complete file review to appeal a projected liability amount. Any documents relative to the appeal that include PII data must be redacted except the student's name and last four digits of his / her social security number (please see the attached document, "Protection of Personally Identifiable Information," for instructions on how to mail "hard copy" records containing PII); and
- (4) include a copy of the FPRD. The program review control number (PRCN) must also accompany the request for review.

If the appeal request is complete and timely, the Department will schedule an administrative hearing in accordance with § 487(b)(2) of the HEA, 20 U.S.C. § 1094(b)(2). The procedures followed with respect to MI's appeal will be those provided in 34 C.F.R. Part 668, Subpart H. Interest on the appealed liabilities shall continue to accrue at the applicable value of funds rate, as established by the United States Department of Treasury, or if the liabilities are for refunds, at the interest rate set forth in the loan promissory note(s).

Record Retention:

Program records relating to the period covered by the program review must be retained until the later of: resolution of the loans, claims or expenditures questioned in the program review; or the end of the retention period otherwise applicable to the record under 34 C.F.R. §§ 668.24(e)(1), (e)(2), and (e)(3).

The Department expresses its appreciation for the courtesy and cooperation extended during the review. If MI has any questions regarding this letter, please contact Jon Finkelstein at 404-974-9341. Questions relating to any appeal of the FPRD should be directed to the address noted in the Appeal Procedures section of this letter.

(b)(6)

Charles Engstrom
Director

cc: Ms. Elaine M. Neely, Chief Regulatory Officer
Ms. Amy Kienitz, Vice President, Financial Services
GA Non-Public Postsecondary Education Commission
Council on Occupational Education

PROTECTION OF PERSONALLY IDENTIFIABLE INFORMATION

Personally Identifiable Information (PII) being submitted to the Department must be protected. PII is any information about an individual which can be used to distinguish or trace an individual's identity (some examples are name, social security number, date and place of birth).

PII being submitted electronically or on media (e.g., CD-ROM, floppy disk, DVD) must be encrypted. The data must be submitted in a .zip file encrypted with Advanced Encryption Standard (AES) encryption (256-bit is preferred). The Department uses WinZip. However, files created with other encryption software are also acceptable, provided that they are compatible with WinZip (Version 9.0) and are encrypted with AES encryption. Zipped files using WinZip must be saved as Legacy compression (Zip 2.0 compatible).

The Department must receive an access password to view the encrypted information. The password must be e-mailed separately from the encrypted data. The password must be 12 characters in length and use three of the following: upper case letter, lower case letter, number, special character. A manifest must be included with the e-mail that lists the types of files being sent (a copy of the manifest must be retained by the sender).

Hard copy files and media containing PII must be:

- sent via a shipping method that can be tracked with signature required upon delivery
- double packaged in packaging that is approved by the shipping agent (FedEx, DHL, UPS, USPS)
- labeled with both the "To" and "From" addresses on both the inner and outer packages
- identified by a manifest included in the inner package that lists the types of files in the shipment (a copy of the manifest must be retained by the sender).

PII data cannot be sent via fax.

Prepared for
Medtech Institute

Federal Student Aid
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the AMERICAN MIND™

OPE ID 03804400
PRCN 2012-2-04-27832

Prepared by
U.S. Department of Education
Federal Student Aid
School Participation Division - Atlanta

Final Program Review Determination

February 15, 2013

Federal Student Aid, Atlanta School Participation Division
61 Forsyth Street Room 18T40
Atlanta, Georgia 30303-8918
www.FederalStudentAid.ed.gov

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A. Institutional Information

Medtech Institute
4501 Circle 75 Parkway
Suite D-4280
Atlanta, Georgia 30339-6040

Type: Proprietary

Highest Level of Offering: Certificate/Diploma

Accrediting Agency: Council on Occupational Education

Current Student Enrollment: 1409 (2011)

% of Students Receiving Title IV: 87.9% (2011)

Title IV Participation – Postsecondary Education Participants System (PEPS):

	2011-2012
William D. Ford Direct Loan Program	\$ 4,023,886
Federal Pell Grant Program	\$ 2,713,896
Federal Supplemental Educational Opportunity Grant Program	\$ 96,575
Federal Work Study Program	\$ 76,815
Total:	<u>\$ 6,911,172</u>

<i>Default Rate FFEL/DL:</i>	2010	9.8%
	2009	7.3%
	2008	2.7%

B. Scope of Review

The U.S. Department of Education (the Department) conducted a program review at Medtech Institute (MI) from March 12, 2012 to March 16, 2012. The review was conducted by Jon Finkelstein, Pamela Clemmer and Meghan Gladden.

The focus of the review was to determine MI's compliance with the statutes and regulations as they pertain to the institution's administration of the Title IV, HEA programs. The review consisted of, but was not limited to, an examination of MI's policies and procedures regarding institutional and student eligibility, individual student financial aid and academic files, attendance records, student account ledgers, and fiscal records.

A sample of 30 files was identified for review from the 2010/2011 (15) and 2011/2012 (15) award

years. The files were selected randomly from a statistical sample of the total population receiving Title IV, HEA program funds for each award year. Appendix A lists the names and student numbers of the students whose files were examined during the program review. A program review report was issued on June 14, 2012.

Disclaimer:

Although the review was thorough, it cannot be assumed to be all-inclusive. The absence of statements in the report concerning MI's specific practices and procedures must not be construed as acceptance, approval, or endorsement of those specific practices and procedures. Furthermore, it does not relieve MI of its obligation to comply with all of the statutory or regulatory provisions governing the Title IV, HEA programs.

C. Findings and Final Determinations

Resolved Findings

Findings 11-2, 11-5, 11-6, 11-7 and 11-8

MI has taken the corrective actions necessary to resolve findings 11-2, 11-5, 11-6, 11-7 and 11-8 of the program review report. Therefore, these findings may be considered closed. Appendix E contains MI's response to the Program Review Report. Included in this response is MI's corrective action and applicable policy and procedure documents.

Resolved Findings with Comments

The following program review findings have been resolved by the institution, and may be considered closed. These findings are included solely for the purpose of discussing resolution of the findings.

Finding 11-1 Student Confirmation Report Filed Late/Inaccurate/Missing

Citation: 34 C.F.R. § 685.309 (b) states a school shall—

- (1) Upon receipt of a student status confirmation report from the Secretary, complete and return that report to the Secretary within 30 days of receipt; and
- (2) Unless it expects to submit its next student status confirmation report to the Secretary within the next 60 days, notify the Secretary within 30 days if it discovers that a Direct Subsidized, Direct Unsubsidized, or Direct PLUS Loan has been made to or on behalf of a student who—
 - (i) Enrolled at that school but has ceased to be enrolled on at least a half-time basis;
 - (ii) Has been accepted for enrollment at that school but failed to enroll on at least a half-time basis for the period for which the loan was intended; or

(iii) Has changed his or her permanent address.

(3) The Secretary provides student status confirmation reports to a school at least semi-annually.

(4) The Secretary may provide the student status confirmation report in either paper or electronic format.

Noncompliance: During the course of the program review, several students were identified with late and/or inaccurate enrollment reporting.

Required Action: Based upon the error rate of this finding MI had to conduct a 100% file review of enrollment reporting for students who attended MI during the 2010-2011 and 2011-2012 award years (including students identified in Program Review Sample). MI was required to correct any errors discovered in the file review and report the outcome to the Department as part of MI's Program Review Report response.

MI was required to submit a copy of each affected student's corrected NSLDS enrollment history. In addition, MI was required to revise its enrollment reporting policy/procedures and submit the revised document to the Department for review.

Institution's Response: MI agreed with the finding. MI completed the full file review for all students enrolled in the 2010-2011 and 2011-2012 award years and updated each student's enrollment status in NSLDS (if necessary). In addition, MI provided the Department with a revised NSLDS Reporting Procedures document.

As a result of this finding, MI has discontinued its agreement with its third party servicer and has transferred the NSLDS reporting process to internal staff. MI now transmits all enrollment data to NSLDS via CampusVue. Additionally, MI transitioned from a bi-monthly to a monthly reporting cycle for NSLDS reporting.

Final Determination: The Department conducted a review of the individual student records that were submitted in response to this finding. In several instances, beginning on or around 8/3/2012, MI began reporting enrollment status for students attending the Tucker Campus (OPEID 03804402) and Morrow Campus (03804401) under the locator OPEID (03804400). The reported status in each instance was 'No Record Found'.

In addition, in several instances, MI reported an erroneous status of 'Never Attended' via NSLDS Web during the timeframe of 7/30/2012 through 8/2/2012 (OPE ID 03804400).

The Vice President of Financial Services was contacted regarding this issue. MI's Information Technology department has been contacted for research and correction. The Vice President of Financial Services has been instructed to forward resolution documentation to its auditor so that it may be addressed in the next regularly scheduled non-federal audit.

Beyond the issues identified in the earlier paragraph, the review was deemed acceptable. In addition, the Department reviewed MI's updated NSLDS Reporting Procedure document. This review was also deemed acceptable.

Findings with Final Determinations:

Finding 11-3: Incorrect Federal Pell Grant Calculation/Clock Hour or Institution without Fixed Terms – Incorrect Proration

Citation: 34 C.F.R. § 690.63 (e) states the Federal Pell Grant for a payment period for a student in a program using credit hours without terms or using clock hours is calculated by—

(1) Determining the student's Scheduled Federal Pell Grant using the Payment Schedule; and

(2) Multiplying the amount determined under paragraph (e)(1) of this section by the lesser of—

The number of credit or clock hours in the payment period

÷

The number of credit or clock hours in the program's academic year

OR

The number of weeks of instructional time in the payment period

÷

The number of weeks of instructional time in the program's academic year

34 C.F.R. § 668.8(k) states except as provided in paragraph (k)(2) of this section, if an institution offers an undergraduate educational program in credit hours, the institution must use the formula contained in paragraph (l) of this section to determine whether that program satisfies the requirements contained in paragraph (c)(3) or (d) of this section, and the number of credit hours in that educational program for purposes of the title IV, HEA programs, unless—

(i) The program is at least two academic years in length and provides an associate degree, a bachelor's degree, a professional degree, or an equivalent degree as determined by the Secretary; or

(ii) Each course within the program is acceptable for full credit toward that institution's associate degree, bachelor's degree, professional degree, or equivalent degree as determined by the Secretary provided that—

(A) The institution's degree requires at least two academic years of study; and

(B) The institution demonstrates that students enroll in, and graduate from, the degree program.

34 C.F.R. § 668.8(l)(1) states that except as provided in paragraph (l)(2) of this section, for purposes

of determining whether a program described in paragraph (k) of this section satisfies the requirements contained in paragraph (c)(3) or (d) of this section, and of determining the number of credit hours in that educational program with regard to the title IV, HEA programs—

- (i) A semester hour must include at least 37.5 clock hours of instruction;
- (ii) A trimester hour must include at least 37.5 clock hours of instruction; and
- (iii) A quarter hour must include at least 25 clock hours of instruction.

(2) The institution's conversions to establish a minimum number of clock hours of instruction per credit may be less than those specified in paragraph (l)(1) of this section, if the institution's designated accrediting agency, or recognized State agency for the approval of public postsecondary vocational institutions, for participation in the title IV, HEA programs has not identified any deficiencies with the institution's policies and procedures, or their implementation, for determining the credit hours, as defined in 34 CFR 600.2, that the institution awards for programs and courses, in accordance with 34 CFR 602.24(f), or, if applicable, 34 CFR 603.24(c), so long as—

- (i) The institution's student work outside of class combined with the clock-hours of instruction **meet or exceed** the numeric requirements in paragraph (l)(1) of this section; and
- (ii)(A) A semester hour must include at least 30 clock hours of instruction;
- (B) A trimester hour must include at least 30 clock hours of instruction; and
- (C) A quarter hour must include at least 20 hours of instruction.

Additionally, the 2011-2012 Student Aid Handbook (Volume 2, Chapter 2, page.29) states that because the results of these formulas determine the eligibility of a program, the resulting number of credit hours may not be rounded up. The results of each course may include the result with fractions or must be rounded down.

Noncompliance: During the course of the review, Medtech submitted copies of Program Modification Applications that were submitted to The Council on Occupational Accreditation (COE) on 6/28/2011. The purpose of these applications was to modify the number of clock hours in MI's programs to include course preparation hours (homework hours). These applications were approved by COE on 3/15/2012. The Medical Office Expert – Administrative and Medical Office Expert – Clinical programs were approved for an additional 166.25 course preparation hours bringing the total number of clock hours for the program to 886.25 ($720 + 166.25$). The clock to credit hour conversion formula for these programs is $886.25 \div 25 = 35.45$. Medtech rounded this up to 36 credit hours. Federal regulations do not allow rounding up. The correct credit hours for these programs are 35.45.

Required Action: Based on the COE approval of MI's application to modify programs to include out of class preparation work, Medtech was required to calculate student eligibility using the total allowable clock hours provided by COE in its Program Modification Approval Letter.

Based upon the error rate of this finding, Medtech was required to conduct a 100% file review of students who were enrolled in the Medical Office Expert – Administrative and Medical Office Expert – Clinical programs with a start date on or after July 1, 2011. The file review included students that were included in the Department's Program Review Sample. MI was required to identify any over-awards discovered in the file review and report the outcome to the Department as part of MI's Program Review Report response.

MI was required to revise its awarding policy/procedures to ensure future compliance. The revised policy/procedures document was required to be submitted in response to the Program Review Report.

Institution's Response: MI agreed with the finding. MI completed the full file review for all students enrolled in the Medical Office Expert – Administrative and Medical Office Expert – Clinical programs with a start date on or after July 1, 2011. In addition, MI provided the Department with a revised awarding/procedures document.

The Vice President of Financial Services notified the Department that the Medical Office Expert – Administrative and Medical Office Expert - Clinical programs have been discontinued as of September 2012.

Final Determination: The Department reviewed the listing of students included in MI's response to this finding. The information provided by MI was inaccurate. The Department accessed COD records for each student and compared those records to the amounts reported. In several cases, the reported Pell Grant disbursement amounts did not match the COD Pell Grant final disbursement amounts. Errors included the following:

- Full Pell amount reported – student withdrew and a partial return was processed after the R2T4 calculation was performed. MI reported a payment in excess of the final amount disbursed.
- MI failed to report the Pell disbursement.
- MI reported a disbursed Pell payment – payment was returned.
- MI never made a Pell disbursement – reported to Department as disbursed.

Appendix F is the revised Finding 11-3 spreadsheet. As a result of the Department's review, codes were added next to each name or in the Amount of Over Award column. The code definitions are as follows:

- Y Amount Reported was Correct
- Asterisk Partial Return Processed - Reported as Full Disbursement
- Add Failed to Report Disbursement
- Returned Pell disbursement was Returned to Department
- No Disbursement No Disbursement Record in COD – Reported

The table below is a partial listing of errors detected in MI's reporting (Finding 11-3).

Student – By Row in Appendix F Spreadsheet	Pell Grant Reported	Pell Grant Disbursed	Over Award Reported	Correct Over Award	Error Code
43	\$2,775.00	\$ 690.00	\$ 42.00	\$ 11.00	*
20	\$0.00	\$2,775.00	\$0.00	\$ 43.00	Add
272	\$2,775.00	\$0.00	\$ 42.00	\$0.00	Returned
506	\$2,775.00	\$0.00	\$ 43.00	\$0.00	No Disbursement

The Department reviewed MI's updated awarding policy/procedures document. This review was deemed acceptable.

MI must return the amount of Pell Grant over payments indicated in Appendix F. The amount of the Title IV over payments is reported in the table below. In addition to the actual over payments, MI is required to pay the Cost of Funds (COF) on ineligible Pell Grant funds. The COF is the expense the Department incurred as a result of MI over awarding Pell Grant funds. The Department incurs a cost when it makes funds available for an institution as those funds are borrowed from the U.S. Treasury and interest is charged to the Department on those funds. The rate of interest is based on when the funds should have been returned to the Department. A copy of the COF calculation is included in Appendix B of this report.

Pell Grant Over Award Total 2011-2012 Closed Award Year	Cost of Funds	Total Liability
\$20,060.00	\$ 121.47	\$20,181.47

MI is liable for this amount and must pay the Department \$20,181.47. Instructions for the repayment of this liability are included in the Repayment Section of this report.

The disbursement record for each student identified in Finding 11-3 must be adjusted in the Common Origination and Disbursement (COD) system based on the recalculated amount identified in the Appendix F.

Adjustments in COD must be completed prior to remitting payment to the Department. Payment cannot be accepted via G5. Once the Department receives payment via check, the Department will apply the principal payment to the applicable G5 award. The interest (COF) will be applied to the general program account.

A copy of the adjustment to each student's COD record must be sent to Jon Finkelstein **within 45 days of the date of this letter.**

Finding 11-4: Improper Award – Direct Loan Not Prorated Accurately

Citation: 34 C.F.R. § 685.203 states that for a program of study that is less than a full academic year in length, the amount that is the same ratio to the grade level loan amount, as the lesser of the—

Number of semester, trimester, quarter, or clock hours enrolled in the payment period

÷

Number of semester, trimester, quarter, or clock hours enrolled in the academic year

OR

The number of weeks enrolled in the payment period

÷

The number of weeks in the academic year

34 C.F.R. § 668.8(k) states except as provided in paragraph (k)(2) of this section, if an institution offers an undergraduate educational program in credit hours, the institution must use the formula contained in paragraph (l) of this section to determine whether that program satisfies the requirements contained in paragraph (c)(3) or (d) of this section, and the number of credit hours in that educational program for purposes of the title IV, HEA programs, unless—

(i) The program is at least two academic years in length and provides an associate degree, a bachelor's degree, a professional degree, or an equivalent degree as determined by the Secretary; or

(ii) Each course within the program is acceptable for full credit toward that institution's associate degree, bachelor's degree, professional degree, or equivalent degree as determined by the Secretary provided that—

(A) The institution's degree requires at least two academic years of study; and

(B) The institution demonstrates that students enroll in, and graduate from, the degree program.

34 C.F.R. 668.8(l)(1) states that except as provided in paragraph (l)(2) of this section, for purposes of determining whether a program described in paragraph (k) of this section satisfies the requirements contained in paragraph (c)(3) or (d) of this section, and of determining the number of credit hours in that educational program with regard to the title IV, HEA programs—

- (i) A semester hour must include at least 37.5 clock hours of instruction;
- (ii) A trimester hour must include at least 37.5 clock hours of instruction; and
- (iii) A quarter hour must include at least 25 clock hours of instruction.

(2) The institution's conversions to establish a minimum number of clock hours of instruction per credit may be less than those specified in paragraph (1)(1) of this section, if the institution's designated accrediting agency, or recognized State agency for the approval of public postsecondary vocational institutions, for participation in the title IV, HEA programs has not identified any deficiencies with the institution's policies and procedures, or their implementation, for determining the credit hours, as defined in 34 CFR 600.2, that the institution awards for programs and courses, in accordance with 34 CFR 602.24(f), or, if applicable, 34 CFR 603.24(c), so long as—

- (i) The institution's student work outside of class combined with the clock-hours of instruction **meet or exceed** the numeric requirements in paragraph (1)(1) of this section; and
- (ii)(A) A semester hour must include at least 30 clock hours of instruction;
- (B) A trimester hour must include at least 30 clock hours of instruction; and
- (C) A quarter hour must include at least 20 hours of instruction.

Additionally, the 2011-2012 Student Aid Handbook (Volume 2, Chapter 2, page 29) states that because the results of these formulas determine the eligibility of a program, the resulting number of credit hours may not be rounded up. The results of each course may include the result with fractions or must be rounded down.

Noncompliance: During the course of the review, Medtech submitted copies of Program Modification Applications that were submitted to The Council on Occupational Accreditation (COE) on 6/28/2011. The purpose of these applications was to modify the number of clock hours in MI's programs to include course preparation hours (homework hours). These applications were approved by COE on 3/15/2012. The Medical Office Expert – Administrative and Medical Office Expert – Clinical programs were approved for an additional 166.25 course preparation hours bringing the total number of clock hours for the program to 886.25 (720 + 166.25). The clock to credit hour conversion formula for these programs is $886.25 \div 25 = 35.45$. Medtech rounded this up to 36 credit hours. Federal regulations do not allow rounding up. The correct credit hours for these programs are 35.45.

Required Action: Based on the COE approval of MI's application to modify programs to include out of class preparation work, Medtech was required to calculate student eligibility using the total allowable clock hours provided by COE in its Program Modification Approval Letter.

Based upon the error rate of this finding Medtech was required to conduct a 100% file review of

students who were enrolled in the Medical Office Expert – Administrative and Medical Office Expert – Clinical programs with a start date on or after July 1, 2011. The file review included students that were included in the Department's Program Review Sample. MI was required to identify any over-awards discovered in the file review and report the outcome to the Department as part of MI's Program Review Report response.

MI was required to revise its awarding policy/procedures to ensure future compliance. The revised policy/procedures document was required to be submitted in response to the Program Review Report.

Institution's Response: MI agreed with the finding. MI completed the full file review for all students enrolled in the Medical Office Expert – Administrative and Medical Office Expert – Clinical programs with a start date on or after July 1, 2011. In addition, MI provided the Department with a revised awarding/procedures document.

The Vice President of Financial Services notified the Department that the Medical Office Expert – Administrative and Medical Office Expert - Clinical programs have been discontinued as of September 2012.

Final Determination: The Department reviewed the listing of students included in MI's response to this finding. The information provided by MI was inaccurate. The Department accessed COD records for each student and compared those records to the amounts reported. In several cases, the reported Direct Loan disbursement amounts did not match the COD final Direct Loan disbursement amounts. Errors included the following:

1. Full loan amount reported – student withdrew and a partial return was processed after the R2T4 calculation was performed. MI reported a payment in excess of the final amount disbursed.
2. MI failed to report PLUS loan disbursements.
3. MI failed to adjust the over award amount to exclude the origination fee (net loan).
4. MI failed to report loan disbursements.

Appendix G is the revised Finding 11-4 spreadsheet. Next to each name, there is a code that was inserted after the Department's review. The code definitions are as follows:

- Add Disbursement not Reported
- Asterisk Partial Return Processed - Initial Amount Reported was Full
- R Full disbursement Returned – No Over Award

Student – By Row in Appendix G Spreadsheet	Loan Disbursement Reported	Loan Disbursed	Over Award Reported	Correct Over Award (Net)	Error Code
42	\$0.00	\$3,000.00 - Unsubsidized	\$0.00	\$ 45.77	Add
383	\$1,750.00 – Subsidized	\$1,094.00 – Subsidized	\$ 25.87	\$ 16.91	*
22	\$3,000.00 – Unsubsidized	\$0.00	\$ 45.77	\$0.00	R

The Department reviewed MI's updated awarding policy/procedures document. This review was deemed acceptable.

The Department calculated an estimated actual loss for loans that were disbursed after 7/2/2011 to students enrolled in the Medical Office Expert – Administrative and Medical Office Expert – Clinical programs. Federal Student Aid (FSA) adopted the Estimated Loss Formula (the Formula) to calculate the amount of losses incurred by the government with respect to ineligible loans that remain with the holder and are routinely serviced and collected like any other loans. But for the error of the party that caused those loans to be made, the Department would not have incurred these costs, and that party is liable to the Department for those costs. FSA does not consider borrowers who receive these routinely-handled ineligible loans to repay differently, or with fewer defaults, than other borrowers, or to cause lower costs of other kinds than are incurred for eligible loans. FSA has revised the Formula to use the default costs and other cost data compiled by the Department's Budget Office to determine the amount needed to make the taxpayer whole for losses it incurs on these ineligible loans.

After Department review, the revised total ineligible loans (over awards) are as follows:

Subsidized	\$11,565.80
Unsubsidized	\$18,235.12
PLUS	\$ 1,330.78

Grand Total: \$31,131.70

The total amount of Direct Loan proceeds that MI improperly disbursed during the 2011/2012 award year for finding 11-4 is \$31,131.70. The total estimated actual loss that MI must pay to the Department for the ineligible loans is **\$408.55**. The result of the estimated loss calculation is included in Appendix C. Instructions for the repayment of this liability are included in the Payment Instructions section of this report.

D. Recommendation

The following is a recommendation based upon observations made by the review team during the program review. MI is not required to provide a response to, nor is Medtech required to act upon this recommendation. However, the review team believes that adoption of this recommendation will assist the institution in the administration of Title IV, HEA program funds.

During the course of the review, it was noted that MI has used a variety of formats in conducting student loan entrance and exit counseling. Pamphlets and institutional forms have been provided to students. The institutional forms were not consistent during the award years that were reviewed.

The Department strongly recommends that MI begin to utilize the Department's entrance and exit counseling website – www.studentloans.gov. This tool will provide MI with assurance that all statutory requirements have been met. The Department's site also provides students will have the ability to print a confirmation page. This confirmation page can be included in the students file to verify completion. Additionally, the completion of counseling is captured by the Common Origination and Disbursement System. Finally, the Department's exit counseling tool provides the student with a listing of his/her outstanding student loans by electronically displaying current information housed in the National Student Loan Data System.

Each of these benefits will enhance MI's compliance, operational and customer service efforts. The Department strongly recommends that MI operationalize this policy/procedure.

E. Summary of Liabilities

The total amount calculated as liabilities from Finding 11-3 and Finding 11-4 in the program review determination is as follows.

Total Liability **\$20,590**

E. Payment Instructions

MI owes to the Department \$20,590. Payment must be made by forwarding a check made payable to the "U.S. Department of Education" to the following address within 45 days of the date of this letter:

*U.S. Department of Education
P.O. Box 979026
St. Louis, MO 63197-9000*

Remit checks only. Do not send correspondence to this address.

Payment must be made via check and sent to the above Post Office Box. Payment and/or adjustments made via G5 will not be accepted as payment of this liability. Instead, the school must

first make any required adjustments in COD as required by the applicable finding(s) and Section II – Instructions by Title IV, HEA Program (below), remit payment, and upon receipt of payment the Department will apply the funds to the appropriate G5 award (if necessary).

The following identification data must be provided with the payment:

*Amount: \$20,590.00
DUNS: 169327033
TIN: 582584867
Program Review Control Number: 2012-2-04-27832*

Terms of Payment

As a result of this final determination, the Department has created a receivable for this liability and payment must be received by the Department within **45 days of the date of this letter**. If payment is not received within the 45-day period, interest will accrue in monthly increments from the date of this determination, on the amounts owed to the Department, at the current value of funds rate in effect as established by the Treasury Department, until the date of receipt of the payment. MI is also responsible for repaying any interest that accrues. If you have any questions regarding interest accruals or payment credits, contact the Department's Accounts Receivable Group at (202) 245-8080 and ask to speak to MI's account representative.

If full payment cannot be made within **45 days** of the date of this letter, contact the Department's Accounts Receivable Group to apply for a payment plan. Interest charges and other conditions apply. Written request may be sent to:

U.S. Department of Education
OCFO Financial Management Operations
Accounts Receivable Group
550 12th Street, S.W., Room 6114
Washington, DC 20202-4461

If within 45 days of the date of this letter, MI has neither made payment in accordance with these instructions nor entered into an arrangement to repay the liability under terms satisfactory to the Department, the Department intends to collect the amount due and payable by administrative offset against payments due MI from the Federal Government. **MI may object to the collection by offset only by challenging the existence or amount of the debt.** To challenge the debt, MI must **timely appeal** this determination under the procedures described in the "Appeal Procedures" section of the cover letter. The Department will use those procedures to consider any objection to offset. **No separate appeal opportunity will be provided.** If a timely appeal is filed, the Department will defer offset until completion of the appeal, unless the Department determines that offset is necessary as provided at 34 C.F.R. § 30.28. This debt may also be referred to the Department of the Treasury for further action as authorized by the Debt Collection Improvement Act of 1996.

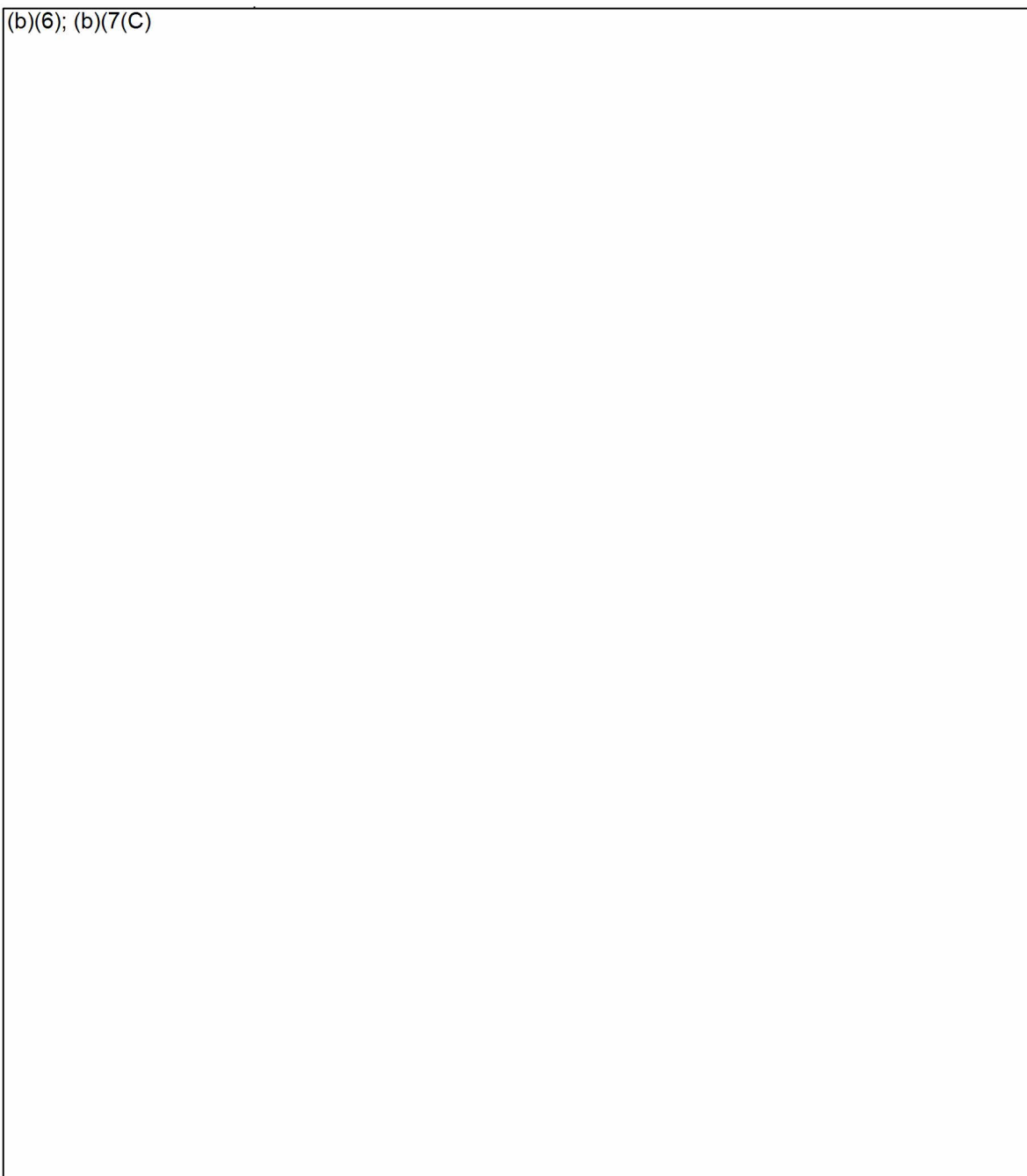
Appendix A

Medtech Institute Program Review Samples

2010-2011 Sample

2011-2012 Sample

(b)(6); (b)(7)(C)



Ineligible Disbursements (Non-Loan) - Cost of Funds and Administrative Cost Allowance

MedTech Institute

[illegible]

[illegible]

Estimated Loss Formula Appendix C

8/29/2012

Enter Institution Name Medtech Institute

Select Institution Type Proprietary 2 Yrs or Less

	Select Type of Loan	Select Award Year	Enter Ineligible Loan Amount	Enter School CDR	Total Subsidy Costs	Estimated Loss Liability
1	DL Subsidized	2011-2012	\$ 11,565.80	9.80%	3.53%	\$ 408.55
2	DL Unsubsidized	2011-2012	\$ 18,235.12	9.80%	-20.98%	\$ -
3	FFEL PLUS	2011-2012	\$ 1,330.78	9.80%	-28.62%	\$ -
	Finding 11-4		\$ 31,131.70			\$ 408.55
4						
5						
6						
	Description		\$ -			\$ -
7						
8						
9						
	Description		\$ -			\$ -
10						
11						
12						
	Description		\$ -			\$ -
Original Ineligible Loan Liability			\$ 31,131.70	Total Estimated Loss		\$ 408.55

To calculate estimated loss for a given ineligible loan amount, that amount is multiplied by the total subsidy rates calculated for the ineligible loans. Consolidation Loans will be obtained in the future to prepay some of the ineligible loans; the amount of Consolidation Loans divided by the ineligible Stafford/PLUS loans equals the "Consolidation prepayment rate" (H) for those loans.

The Department's Budget Office calculates, on an annual basis, the rate per dollar of loan of default subsidies (DSRs) and all other subsidies (OSRs) (D & F) for Stafford and PLUS Loans, by cohort year, program, loan type, and risk group (note that 2008-2010 FFEL loan costs are calculated only by cohort year).

	A	B	C	D	E	F	G	H	I	J
	School CDR	Sector CDR*	Ratio **	DSR ***	Adjusted DSR	OSR ***	Avg Cons Year	Cons Prepay %	Cons DSR ***	Cons OS ***
1	9.80%	14.49%	0.68	6.50%	4.42%	-2.17%	2019	21.1%	3.19%	2.89%
2	9.80%	14.49%	0.68	9.11%	6.19%	-28.46%	2019	23.7%	3.26%	2.17%
3	9.80%	14.49%	0.68	5.25%	3.57%	-27.45%	2015	21.4%	2.45%	-24.57%
4										
5										
6										
7										
8										
9										
10										
11										
12										

Federal Student Aid (FSA) calculates the cohort default rates (CDRs) of the institution (A), and the average CDR for the sector for that institution (B). FSA applies the CDR comparison ratio (C), $[A/B = C]$ against the Budget Office's cohort loan DSR (D) to determine the default subsidy rate for the institution (E). The Budget Office estimates the default subsidy rate and other subsidy rate for the Consolidation Loans that will prepay some of these Stafford and PLUS Loans (I & J).

The total subsidy rate for the ineligible Stafford and PLUS Loans is $((E+F) + ((I+J) \times H))$.

The total subsidy cost for these loans is the ineligible loan amount multiplied by the total subsidy rate.

Prepared for

Medtech Institute



START HERE
GO FURTHER
FEDERAL STUDENT AID

OPE ID 03804400

PRCN 201220427832

Prepared by

U.S. Department of Education

Federal Student Aid

Atlanta School Participation Division

Program Review Report

June 14, 2012

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Medtech Institute
OPEID 03804400
PRCN 2012-2-04-27832
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A. Institutional Information

Medtech Institute
4501 Circle 75 Parkway Suite D-4280
Atlanta, Georgia 30339-6040

Type: Proprietary

Highest Level of Offering: Certificate/Diploma

Accrediting Agency: Council on Occupational Education

Current Student Enrollment: 1409 (2011)

Percentage of Students Receiving Title IV: 87.9% (2011)

Title IV Participation Postsecondary Education Participants System (PEPS)

	2010-2011
William D. Ford Direct Loan Program (Direct Loan)	\$ 7,100,878
Federal Pell Grant Program	\$ 4,614,636
Federal Family Education Loan Program (FFEL)	\$ 197,260
Total:	<u>\$ 11,912,774</u>

<i>Default Rate FFEL/DL:</i>	2009	7.3%
	2008	2.7%
	2007	5.5%

B. Scope of Review

The U.S. Department of Education (the Department) conducted a program review at Medtech Institute (MI) from 3/12/2012 to 3/16/2012. The review was conducted by Jon Finkelstein, Pamela Clemmer and Meghan Gladden.

The focus of the review was to determine MI's compliance with the statutes and federal regulations as they pertain to the institution's administration of Title IV programs. The review consisted of, but was not limited to, an examination of MI's policies and procedures regarding institutional and student eligibility, individual student financial aid and academic files, attendance records, student account ledgers, and fiscal records.

A sample of 15 files was identified for review from the 2010-2011 award year and the 2011-2012 award year. The files were selected randomly from a statistical sample of the total population receiving Title IV, HEA program funds for each award year. Appendix A lists the student number and names of the students whose files were examined during the program review.

Disclaimer:

Although the review was thorough, it cannot be assumed to be all-inclusive. The absence of statements in the report concerning MI's specific practices and procedures must not be construed as acceptance, approval, or endorsement of those specific practices and procedures. Furthermore, it does not relieve MI of its obligation to comply with all of the statutory or regulatory provisions governing the Title IV, HEA programs.

This report reflects initial findings. These findings are not final. The Department will issue its final findings in a subsequent Final Program Review Determination letter.

C. Findings

During the review, several areas of noncompliance were noted. Findings of noncompliance are referenced to the applicable statutes and regulations and specify the actions to be taken by MI to bring operations of the financial aid programs into compliance with the statutes and regulations.

C. Findings

Finding 11-1 Student Confirmation Report Filed Late/Inaccurate/Missing

Citation: 34 C.F.R. § 685.309 (b) states a school shall—

(1) Upon receipt of a student status confirmation report from the Secretary, complete and return that report to the Secretary within 30 days of receipt; and

(2) Unless it expects to submit its next student status confirmation report to the Secretary within the next 60 days, notify the Secretary within 30 days if it discovers that a Direct Subsidized, Direct Unsubsidized, or Direct PLUS Loan has been made to or on behalf of a student who—

(i) Enrolled at that school but has ceased to be enrolled on at least a half-time basis;

(ii) Has been accepted for enrollment at that school but failed to enroll on at least a half-time basis for the period for which the loan was intended; or

(iii) Has changed his or her permanent address.

(3) The Secretary provides student status confirmation reports to a school at least semi-annually.

(4) The Secretary may provide the student status confirmation report in either paper or electronic format.

Noncompliance: During the course of the program review, several students were identified with late and/or inaccurate enrollment reporting. The table below is a listing of five students that were identified as having enrollment reporting deficiencies during the program review.

<u>Student Number</u>	<u>Status Reported</u>	<u>Certification Date</u>	<u>Reason for Non-Compliance</u>
1	Never Attended	4/27/2010	Student was in attendance from 4/21/2010 to 1/26/11. School failed to update enrollment status every 60 days and failed to report a graduated status at the conclusion of the student's program.
3	Full Time	12/20/2010 and 4/21/2011	The 12/20/2010 reporting date was over 60 days from the start of the program. The 4/21/2011 reporting date indicated full time status. The student graduated 4/5/2011.

4	Full Time	10/29/2010	Student began program on 5/27/2010. Schools first enrollment reporting was late - certified on 10/29/2010.
6	Withdrawn	6/24/2011	Schools initial reporting indicated a status of withdrawn. The initial report should have been full time with a start date of 3/9/2011. The initial report was late and had an inaccurate status.
8	Full Time	2/21/2011 and 4/21/2011	School's first reporting was 2/21/2011. Student began program on 10/22/2010. First reporting was over 60 days from the start of the program. School reported full time status on 4/21/2011. Student graduated from program on 4/5/2011. The status was inaccurate for the 4/21/2011 reporting.

Required Action: Based upon the error rate of this finding the school must conduct a 100% file review of enrollment reporting for students who attended MI during the 2010-2011 and 2011-2012 award years (including students identified in Program Review Sample). MI must correct any errors discovered in the file review and report the outcome to the Department as part of MI's Program Review Report response. The results of this review must be provided in Excel or a similar spreadsheet format (separated by award year) and contain the following fields:

1. Student's Name
2. Student's SSN
3. Enrollment Reporting Correct or Incorrect
4. Detail Regarding Correction – If Correct – N/A
5. Date of Correction
6. Reason for Error – N/A if Correct

Please send the file review summary reports (spreadsheets) to Jon Finkelstein by e-mail at jon.finkelstein@ed.gov. See the enclosure – protection of Personally Identifiable Information (PII) for instructions regarding electronic submissions to the Department for data containing PII. Please present a separate e-mail with an access password to Jon Finkelstein.

MI must submit a copy of each affected student's corrected NSLDS enrollment history. In addition, MI must revise its enrollment reporting policy/procedures to ensure future compliance. The revised policy/procedures document must be submitted in response to this Program Review Report.

Finding 11-2: Return to Title IV (R2T4) Calculation Errors

Citation: 34 C.F.R. § 668.22 (a) states when a recipient of Title IV grant or loan assistance withdraws from an institution during a payment period of enrollment in which the recipient began attendance, the institution must determine the amount of Title IV grant or loan assistance that the student earned as of the student's withdrawal date.

34 C.F.R. § 668.22 (e)(2) states the percentage of Title IV grant or loan assistance that has been earned by the student is equal to the percentage of the payment period or period of enrollment that the student completed as of the student's withdrawal date.

34 C.F.R. § 668.22 (i) states the total amount of unearned Title IV assistance to be returned is equal to the total amount of institutional charges incurred by the student for the payment period or period of enrollment multiplied by the percentage of Title IV grant or loan assistance that has not been earned by the student.

34 C.F.R. § 668.22 (g) states that the institution must return, in the order specified in paragraph (i) of this section, the lesser of—

- (i) The total amount of unearned title IV assistance to be returned as calculated under paragraph (e)(4) of this section; or
 - (ii) An amount equal to the total institutional charges incurred by the student for the payment period or period of enrollment multiplied by the percentage of title IV grant or loan assistance that has not been earned by the student, as described in paragraph (e)(3) of this section.
- (2) For purposes of this section, "institutional charges" are tuition, fees, room and board (if the student contracts with the institution for the room and board) and other educationally-related expenses assessed by the institution.

Noncompliance: During the course of the review, 6 students were identified with an incorrect R2T4 calculation. For one first student, the institutional charges section of the R2T4 calculation did not include the XL Fee Lab (XL) component. For the other students, the institutional charges section of the R2T4 calculation included a registration fee (\$100). The table below provides the student specific information.

<u>Student Number</u>	<u>Withdrawal Determination Date</u>	<u>Incorrect Institutional Charges</u>	<u>Correct Institutional Charges</u>	<u>Incorrect Return Amounts</u>	<u>Correct Return Amounts</u>
6	4/21/2011	<u>Registration Fee</u> = <u>\$ 100.00</u>	Tuition - \$6,950.00 Books - \$ 500.00 XL - \$ 997.50	Pell Grant - \$ 396.87	To Be Determined
10	3/3/2011	<u>Registration Fee - \$100.00</u>	Tuition - \$7,100.00 Books - \$ 600.00 XL - \$1,247.50	Unsubsidized Stafford - \$2,985.00 Subsidized Stafford - \$ 766.00	To Be Determined
19	8/5/2011	<u>Registration Fee - \$100.00</u>	Tuition - \$6,656.25 Books - \$ 600.00 XL - \$1,247.50	Pell Grant - \$1,715.72	To Be Determined
21	1/8/2012		Tuition - \$7,100.00 Books - \$ 600.00 <u>XL - \$1,297.50</u>	Unsubsidized Stafford - \$2,985.00 Subsidized Stafford - \$1,742.00 Pell Grant - \$ 867.65	To Be Determined
23	9/8/2011	<u>Registration Fee - \$100.00</u>	Tuition - \$7,100.00 Books - \$ 600.00 XL - \$1,247.50	Unsubsidized Stafford - \$2,985.00 Subsidized Stafford - \$1,009.32	To Be Determined
29	8/2/2011	<u>Registration Fee - \$100.00</u>	Tuition - \$6,950.00 Books - \$ 500.00 XL - \$ 997.50	Pell Grant - \$1,612.19	To Be Determined

Required Action: The institutional charges section of the R2T4 calculation must include all educationally related costs. The omission of the XL charge for student 21 and the inclusion of the registration fee for students 6, 10, 19, 23 and 29 could result in incorrect R2T4 calculations.

Based upon the error rate of this finding, the school must conduct a 100% file review of students who withdrew during the 2010-2011 and 2011-2012 award years (including students identified in this Program Review Report). MI must identify any errors discovered in the file review and report the outcome to the Department as part of MI's Program Review Report response. The results of this review must be provided in Excel or a similar spreadsheet format (separated by award year) and contain the following fields:

1. Student's Name
2. Student's SSN
3. Date of Withdrawal Determination
4. R2T4 Calculation - Correct or Incorrect
5. Original Return – N/A if Correct
6. Adjusted Return – N/A if Correct
7. Reason for Error – N/A if Correct

Please send the file review summary reports (spreadsheets) to Jon Finkelstein by e-mail at jon.finkelstein@ed.gov. See the enclosure – Protection of Personally Identifiable Information (PII) for instructions regarding electronic submissions to the Department for data containing PII. Please present a separate e-mail with an access password to Jon Finkelstein.

MI must submit a revised copy of any affected student's ledger. In addition, MI must revise its R2T4 policy/procedures to ensure future compliance. The revised policy/procedures document must be submitted in response to this Program Review Report.

Finding 11-3: Incorrect Federal Pell Grant Calculation/Clock Hour or Institution without Fixed Terms – Incorrect Proration

Citation: 34 C.F.R. § 690.63 (e) states the Federal Pell Grant for a payment period for a student in a program using credit hours without terms or using clock hours is calculated by—

(1) Determining the student's Scheduled Federal Pell Grant using the Payment Schedule; and

(2) Multiplying the amount determined under paragraph (e)(1) of this section by the lesser of—

The number of credit or clock hours in the payment period

÷

The number of credit or clock hours in the program's academic year

OR

The number of weeks of instructional time in the payment period

÷

The number of weeks of instructional time in the program's academic year

34 C.F.R. § 668.8(k) states except as provided in paragraph (k)(2) of this section, if an institution offers an undergraduate educational program in credit hours, the institution must use the formula contained in paragraph (l) of this section to determine whether that program satisfies the requirements contained in paragraph (c)(3) or (d) of this section, and the number of credit hours in that educational program for purposes of the title IV, HEA programs, unless—

(i) The program is at least two academic years in length and provides an associate degree, a bachelor's degree, a professional degree, or an equivalent degree as determined by the Secretary; or

(ii) Each course within the program is acceptable for full credit toward that institution's associate degree, bachelor's degree, professional degree, or equivalent degree as determined by the Secretary provided that—

(A) The institution's degree requires at least two academic years of study; and

(B) The institution demonstrates that students enroll in, and graduate from, the degree program.

34 C.F.R. § 668.8(l)(1) states that except as provided in paragraph (l)(2) of this section, for purposes of determining whether a program described in paragraph (k) of this section satisfies the requirements contained in paragraph (c)(3) or (d) of this section, and of determining the number of credit hours in that educational program with regard to the title IV, HEA programs—

- (i) A semester hour must include at least 37.5 clock hours of instruction;
- (ii) A trimester hour must include at least 37.5 clock hours of instruction; and
- (iii) A quarter hour must include at least 25 clock hours of instruction.

(2) The institution's conversions to establish a minimum number of clock hours of instruction per credit may be less than those specified in paragraph (l)(1) of this section, if the institution's designated accrediting agency, or recognized State agency for the approval of public postsecondary vocational institutions, for participation in the title IV, HEA programs has not identified any deficiencies with the institution's policies and procedures, or their implementation, for determining the credit hours, as defined in 34 CFR 600.2, that the institution awards for programs and courses, in accordance with 34 CFR 602.24(f), or, if applicable, 34 CFR 603.24(c), so long as—

(i) The institution's student work outside of class combined with the clock-hours of instruction **meet or exceed** the numeric requirements in paragraph (l)(1) of this section; and

(ii)(A) A semester hour must include at least 30 clock hours of instruction;

(B) A trimester hour must include at least 30 clock hours of instruction; and

(C) A quarter hour must include at least 20 hours of instruction.

Additionally, the 2011-2012 Student Aid Handbook (Volume 2, Chapter 2, page 29) states that because the results of these formulas determine the eligibility of a program, the resulting number of credit hours may not be rounded up. The results of each course may include the result with fractions or must be rounded down.

Noncompliance: During the course of the review, Medtech submitted copies of Program Modification Applications that were submitted to The Council on Occupational Accreditation (COE) on June 28, 2011. The purpose of these applications was to modify the number of clock hours in MI's programs to include course preparation hours (homework hours). These applications were approved by COE on 3/15/2012. The Medical Office Expert – Administrative and Medical Office Expert – Clinical programs were approved for an additional 166.25 course preparation hours bringing the total number of clock hours for the program to 886.25 (720 + 166.25). The clock to credit

hour conversion formula for these programs is $886.25 \div 25 = 35.45$. Medtech rounded this up to 36 credit hours. Federal regulations do not allow rounding up. The correct credit hours for these programs are 35.

This report will provide student specific information for two students from the Department's sample. Student 16 (Natasha Basdeo) and student 24 (Sheena Jones) are/were enrolled in the Medical Office Expert – Clinical program. These students represent a portion of the students identified in the sample that were enrolled in either the Medical Office Expert – Administrative or Medical Office Expert – Clinical programs.

Student specific information for students 16 and 24 is as follows:

<u>Student Number</u>	<u>Incorrect Pell Disbursement</u>	<u>Correct Pell Disbursement</u>	<u>Date of Disbursement</u>	<u>Amount of Return</u>
16	\$2,775.00	\$2,698.00	12/2/2011	\$ 77.00
16	\$2,775.00	\$2,698.00	1/10/2012	\$ 77.00
24	\$2,775.00	\$2,698.00	12/15/2011	\$ 77.00

Required Action: Based on the COE approval of MI's application to modify programs to include out of class preparation work, Medtech must calculate student eligibility using the total allowable clock hours provided by COE in its Program Modification Approval letter.

Based upon the error rate of this finding, Medtech must conduct a 100% file review of students who were enrolled in the Medical Office Expert – Administrative and Medical Office Expert – Clinical programs with a start date on or after July 1, 2011. The file review must include students that were included in the Department's program review. MI must identify any over-awards discovered in the file review and report the outcome to the Department as part of MI's Program Review Report response. The results of this review must be provided in Excel or a similar spreadsheet format (separated by award year) and contain the following fields:

1. Student's Name
2. Student's SSN
3. Incorrect Pell Disbursement
4. Correct Pell Disbursement
5. Amount of Over-award

Please send the file review summary reports (spreadsheets) to Jon Finkelstein by e-mail at jon.finkelstein@ed.gov. See the enclosure – protection of Personally Identifiable Information (PII) for instructions regarding electronic submissions to the Department for data containing PII. Please present a separate e-mail with an access password to Mr. Finkelstein.

MI must submit a revised copy of each affected student's ledger. In addition, MI must revise its awarding policy/procedures to ensure future compliance. The revised policy/procedures document must be submitted in response to this Program Review Report.

Finding 11-4: Improper Award – Direct Loan Not Prorated Accurately

Citation: 34 C.F.R. § 685.203 states that for a program of study that is less than a full academic year in length, the amount that is the same ratio to the grade level loan amount, as the lesser of the—

Number of semester, trimester, quarter, or clock hours enrolled in the payment period

÷

Number of semester, trimester, quarter, or clock hours enrolled in the academic year

OR

The number of weeks enrolled in the payment period

÷

The number of weeks in the academic year

34 C.F.R. § 668.8(k) states except as provided in paragraph (k)(2) of this section, if an institution offers an undergraduate educational program in credit hours, the institution must use the formula contained in paragraph (l) of this section to determine whether that program satisfies the requirements contained in paragraph (c)(3) or (d) of this section, and the number of credit hours in that educational program for purposes of the title IV, HEA programs, unless—

(i) The program is at least two academic years in length and provides an associate degree, a bachelor's degree, a professional degree, or an equivalent degree as determined by the Secretary; or

(ii) Each course within the program is acceptable for full credit toward that institution's associate degree, bachelor's degree, professional degree, or equivalent degree as determined by the Secretary provided that—

(A) The institution's degree requires at least two academic years of study; and

(B) The institution demonstrates that students enroll in, and graduate from, the degree program.

34 C.F.R. 668.8(l)(1) states that except as provided in paragraph (l)(2) of this section, for purposes of determining whether a program described in paragraph (k) of this section satisfies the requirements contained in paragraph (c)(3) or (d) of this section, and of

determining the number of credit hours in that educational program with regard to the title IV, HEA programs—

- (i) A semester hour must include at least 37.5 clock hours of instruction;
- (ii) A trimester hour must include at least 37.5 clock hours of instruction; and
- (iii) A quarter hour must include at least 25 clock hours of instruction.

(2) The institution's conversions to establish a minimum number of clock hours of instruction per credit may be less than those specified in paragraph (1)(1) of this section, if the institution's designated accrediting agency, or recognized State agency for the approval of public postsecondary vocational institutions, for participation in the title IV, HEA programs has not identified any deficiencies with the institution's policies and procedures, or their implementation, for determining the credit hours, as defined in 34 CFR 600.2, that the institution awards for programs and courses, in accordance with 34 CFR 602.24(f), or, if applicable, 34 CFR 603.24(c), so long as—

(i) The institution's student work outside of class combined with the clock-hours of instruction **meet or exceed** the numeric requirements in paragraph (1)(1) of this section; and

(ii)(A) A semester hour must include at least 30 clock hours of instruction;

(B) A trimester hour must include at least 30 clock hours of instruction; and

(C) A quarter hour must include at least 20 hours of instruction.

Additionally, the 2011-2012 Student Aid Handbook (Volume 2, Chapter 2, page 29) states that because the results of these formulas determine the eligibility of a program, the resulting number of credit hours may not be rounded up. The results of each course may include the result with fractions or must be rounded down.

Noncompliance: During the course of the review, Medtech submitted copies of Program Modification Applications that were submitted to The Council on Occupational Accreditation (COE) on June 28, 2011. The purpose of these applications was to modify the number of clock hours in MI's programs to include course preparation hours (homework hours). These applications were approved by COE on 3/15/2012. The Medical Office Expert – Administrative and Medical Office Expert – Clinical programs were approved for an additional 166.25 course preparation hours bringing the total number of clock hours for the program to 886.25 (720 + 166.25). The clock to credit hour conversion formula for these programs is $886.25 \div 25 = 35.45$. Medtech rounded this up to 36 credit hours. Federal regulations do not allow rounding up. The correct credit hours for these programs are 35.

This report will provide student specific information for two students from the Department's sample. Student 26 (Esther Norman) and student 28 (Cajava Sims) are/were enrolled in the Medical Office Expert – Clinical program. These students represent a portion of the students identified in the sample that were enrolled in either the Medical Office Expert – Administrative or Medical Office Expert – Clinical programs.

Student specific information for students 26 and 28 is as follows:

<u>Student Number</u>	<u>Incorrect Direct Loan Award</u>	<u>Correct Direct Loan Award</u>	<u>Date of Disbursement</u>	<u>Amount of Return</u>
26	\$1,750.00 – Subsidized	\$1,701.00 – Subsidized	8/10/2011	\$ 49.00
26	\$3,000.00 – Unsubsidized	\$2,917.00 – Unsubsidized	8/10/2011	\$ 83.00
26	\$1,750.00 – Subsidized	\$1,701.00 – Subsidized	11/4/2011	\$ 49.00
26	\$3,000.00 – Unsubsidized	\$2,916.00 – Unsubsidized	11/4/2011	\$ 84.00
28	\$1,750.00 – Subsidized	\$1,701.00 – Subsidized	12/2/2011	\$ 49.00
28	\$3,000.00 – Unsubsidized	\$2,917.00 - Unsubsidized	12/2/2011	\$ 83.00
28	\$1,750.00 – Subsidized	\$1,701.00 – Subsidized	3/15/2012	\$ 49.00
28	\$3,000.00 – Unsubsidized	\$2,916.00 - Unsubsidized	3/15/2012	\$ 84.00

Required Action: Based on the COE approval of MI's application to modify programs to include out of class preparation work, Medtech must calculate student eligibility using the total allowable clock hours provided by COE in its program modification approval letter.

Based upon the error rate of this finding Medtech must conduct a 100% file review of students who were enrolled in the Medical Office Expert – Administrative and Medical Office Expert – Clinical programs with a start date on or after July 1, 2011. The file review must include students that were included in the Department's program review. MI must identify any over-awards discovered in the file review and report the outcome to the Department as part of MI's Program Review Report response. The results of this review must be provided in Excel or a similar spreadsheet format (separated by award year) and contain the following fields:

1. Student's Name
2. Student's SSN
3. Incorrect Direct Loan Award
4. Correct Direct Loan Award
5. Amount of over-award (net amount after origination fee)

Please send the file review summary reports (spreadsheets) to Jon Finkelstein by e-mail at jon.finkelstein@ed.gov. See the enclosure – protection of Personally Identifiable Information (PII) for instructions regarding electronic submissions to the Department for data containing PII. Please present a separate e-mail with an access password to Mr. Finkelstein.

MI must submit a revised copy of each affected student's ledger. In addition, MI must revise its awarding policy/procedures to ensure future compliance. The revised policy/procedures document must be submitted in response to this Program Review Report.

Finding 11-5: Inadequate Recordkeeping

Citation: 34 C.F.R. § 690.83 (2) states that the Secretary accepts a student's payment data that is submitted in accordance with procedures established through publication in the federal register. The payment data contains information the Secretary considers to be accurate in light of other available information including that previously provided by the student and institution.

A disbursement date is defined as the date the institution:

- Credits funds to the student's account, or;
- Pays funds directly to the student

34 C.F.R. § 685.300 (a)(1)(5) states that participation in the Direct Loan Program means that eligible students at the school may receive Direct Loans. To participate in the Direct Loan Program, a school shall –

- provide timely and accurate information to the Secretary for the servicing and collection of loans

Noncompliance: Disbursement dates reported to the Common Origination and Disbursement System (COD) did not always match dates that funds were credited to student ledgers. This issue becomes especially critical for loan recipients, as the disbursement date reported to COD is vital in the lender's determination of an accurate repayment start date.

During the course of the review, the following students were identified as having conflicting COD and account ledger disbursement dates.

<u>Student Number</u>	<u>Title IV Program</u>	<u>Disbursement Amount</u>	<u>Student Ledger Disbursement Date</u>	<u>COD Disbursement Date</u>	<u>Difference -- Days Early/Late</u>
4	Pell Grant	\$2,775.00	12/8/2010	12/1/2010	7 Days Late
8	Pell Grant	\$1,908.00 \$1,908.00	12/4/2010 2/23/2011	11/17/2010 2/11/2011	18 Days Late 12 Days Late
20	Direct Loan Unsubsidized	\$2,985.00	10/5/2011	10/10/2011	5 Days Late
22	Pell Grant	\$2,775.00	8/23/2011	8/15/2011	8 Days Late
27	Pell Grant	\$2,775.00	10/17/2011	10/7/2011	10 Days Late

During the course of the review, the following students were identified as having incorrect loan disbursement status codes (disbursed, pending, cancelled) in COD.

<u>Student Number</u>	<u>Title IV Program</u>	<u>Disbursement Date</u>	<u>Disbursement Status Code</u>	<u>Correct Disbursement Status Code</u>
10	Direct Loan Subsidized	2/25/2011	Pending	Cancelled
	Direct Loan Unsubsidized	2/25/2011	Pending	Cancelled
21	Direct Loan Subsidized	3/2/2012	Pending	Cancelled
	Direct Loan Unsubsidized	3/2/2012	Pending	Cancelled
23	Direct Loan Subsidized	11/30/2011	Pending	Cancelled
	Direct Loan Unsubsidized	11/30/2011	Pending	Cancelled
29	Direct Loan Subsidized	8/5/2011 10/31/2011	Pending Pending	Cancelled Cancelled
	Direct Loan Unsubsidized	8/5/2011 10/31/2011	Pending Pending	Cancelled Cancelled

Required Action: The institution must review its COD reporting procedures to determine the cause of the discrepancies. Procedures must be updated to ensure that disbursement dates reported to COD are the same as the date that funds are credited to student accounts. Procedures must also be updated to ensure that disbursement status codes are accurate. In response to this Program Review Report, MI must include a written update of its COD reporting procedures.

Finding 11-6: Verification Violations

Citation: 34 C.F.R. § 668.53 states that an institution shall establish and use written policies and procedures for verifying information contained in the student aid application in accordance with the provisions of this subpart. These policies and procedures must include:

- The time period within which an applicant shall provide the documentation;
- The consequences of an applicant's failure to provide required documentation within the specified time period;
- The method by which the institution notifies an applicant of the results of verification if, as a result of verification, the applicant's expected family contribution (EFC) changes and results in a change in the applicant's award or loan;
- The procedures the institution requires an applicant to follow to correct application information determined to be in error; and
- The procedures for making referrals under 34 C.F.R. § 668.16 -

34 C.F.R. § 668.16 (f)(2) states that to begin to participate in any Title IV, HEA program, an institution shall demonstrate to the Secretary that the institution is capable of adequately administering the program under each of the standards established in this section. The Secretary considers an institution to have administrative capability if the institution develops and applies an adequate system to identify and resolve discrepancies in the information that the institution receives from different sources with respect to a student's application for financial aid under Title IV, HEA programs. In determining whether the institution's system is adequate, the Secretary considers whether the institution obtains and reviews any documents, including any copies of State and Federal income tax returns that are normally collected by the institution to verify information received from the student or other sources.

Noncompliance: During the course of the review, one student (student 10) had conflicting information between the FAFSA, Parents' Federal Tax Return and the Explanation of Low Income Status Form. The discrepancies are as follows:

- 2010-2011 ISIR lists 3 in the household and parent's marital status as single
- 2009 1040A was filed as married filing jointly with 4 exemptions
- Explanation of Low Income Status Form states that the student lives with an Aunt who provides all of her support

There is no documentation in the file to indicate that MI took the necessary steps to resolve the conflicting information. Parental marital status was not confirmed and there was no attempt to determine if the Aunt had legal guardianship, i.e., eligible for a dependency override.

Required Action: The institution must adjust its verification policy/procedures to prevent the reoccurrence of similar violations. Discrepant data must be identified and corrected/documented in the verification process. Continued violations may result in incorrect student aid determinations that could prove harmful to the student and/or the Department.

In its response to this Program Review Report, MI must submit a written update of its verification policies and procedures document.

Finding 11-7: Return of Title IV Funds (R2T4) Made Late

Citation: 34 C.F.R. § 668.22 of the Student Assistance General Provisions specifies the treatment of Title IV funds when a student withdraws from an institution. If a Title IV recipient withdraws after beginning attendance, the percentage of Title IV funds earned by the student must be determined.

If a student provides official notification of his or her intent to withdraw, the date of the institution's determination that the student withdrew is the date the student began the official withdrawal process, or the date of notification, whichever is later. For a student who withdraws without providing notification from an institution not required to take attendance, the institution must determine the withdrawal date no later than 30 days after the end of the earlier of the payment period or the period of enrollment, the academic year, or the student's educational program.

34 C.F.R. § 668.22 (j)(1) states an institution must return the amount of Title IV aid for which it is responsible as soon as possible but not later than 45 days after the date of the institution's determination that the student withdrew.

Noncompliance: During the course of the review, two students were identified with a late R2T4 calculation. Pell Grant and Stafford Loan returns were included in the R2T4 calculation. The Pell Grant return was timely. The Stafford loan return was late. The table below provides student specific information.

<u>Student Number</u>	<u>Withdrawal Determination Date</u>	<u>Title IV Program</u>	<u>Date of Return</u>	<u>On Time/Late</u>
18	10/17/2011	Pell Grant	11/16/2011	On Time
		Stafford Loans Subsidized and Unsubsidized	12/13/2011	Late
19	8/5/2011	Pell Grant	9/22/2011	Late
		Stafford Loans Subsidized and Unsubsidized	9/7/2011	On Time

Required Action: An institution must return the amount of Title IV funds for which it is responsible as soon as possible but not later than 45 days after the date of the institution's determination that the student withdrew. Continued violations may result in undue cost to the Department. In response to this program report, MI must review and revise its R2T4 policy/procedures to ensure that repeat violations are avoided.

Finding 11-8: Student Credit Balance Deficiencies

Citation: 34 C.F.R. 668.165 (b) states that if an institution obtains written authorization from a student or parent, as applicable, the institution may—

(i) Use the student's or parent's title IV, HEA program funds to pay for charges described in §668.164(d)(2) that are included in that authorization; and

(ii) Except if prohibited by the Secretary under the reimbursement or cash monitoring payment method, hold on behalf of the student or parent any title IV, HEA program, funds that would otherwise be paid directly to the student or parent under §668.164(e). Under this provision, the institution may issue a stored-value card or other similar device that allows the student or parent to access those funds at his or her discretion to pay for educationally related expenses.

(2) In obtaining the student's or parent's authorization to perform an activity described in paragraph (b)(1) of this section, an institution—

(i) May not require or coerce the student or parent to provide that authorization;

(ii) Must allow the student or parent to cancel or modify that authorization at any time; and

(iii) Must clearly explain how it will carry out that activity.

(3) A student or parent may authorize an institution to carry out the activities described in paragraph (b)(1) of this section for the period during which the student is enrolled at the institution.

(4)(i) If a student or parent modifies an authorization, the modification takes effect on the date the institution receives the modification notice.

(iii) If a student or parent cancels an authorization to hold title IV, HEA program funds under paragraph (b)(1)(iii) of this section, the institution must pay those funds directly to the student or parent as soon as possible but no later than 14 days after the institution receives that notice.

Noncompliance: The section of MI's Student Authorization form "Authorization to Refund Title IV Funds states the following: "In the event of my withdrawal, please refund any credit balance to my student loan.

I understand that I may modify or cancel this authorization at any time and the credit balance on my account will be issued to me in full within 30 days of the cancellation of this authorization."

Per federal regulations, if a student or parent cancels an authorization to hold title IV, HEA program funds under paragraph (b)(1)(iii) of this section, the institution must pay those funds directly to the student or parent as soon as possible but no later than 14 days after the institution receives that notice.

Student 26 (Ester Norman) signed a Student Authorization form on 6/29/2011 that allowed MI to retain credit balances to cover educational expenses that will occur prior to the end of the academic year and to refund a credit balance to a student loan in the case of withdrawal.

On 11/4/2011 the student had a credit balance of \$225.00 as a result of the disbursement of Title IV funds. On 11/15/2011, MI applied the credit balance to the student's private loan (Tuition Options). This payment was not authorized by the student. Federal regulations stipulate that the credit balance must be returned to the student within 14 days if the school does not acquire proper authorization.

Required Action: Medtech must revise its Student Authorization form to update the section under "Authorization to Refund Title IV Funds".

MI must submit a revised copy of the Student Authorization to Refund Title IV Funds form to the Department. In addition, MI must revise its policy/procedures to ensure future compliance. The revised policy/procedures document must be submitted in response to this Program Review Report.

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PRCN 2012-2-04-27832
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MI must discontinue the practice of applying credit balances to students' private loans without written authorization. MI must revise its policy/procedures to ensure future compliance. A revised policy/procedures document must be submitted in response to this Program Review Report.

D. Recommendation

The following is a recommendation based upon observations made by the review team during the program review. MI is not required to provide a response to, nor is Medtech required to act upon this recommendation. However, the review team believes that adoption of this recommendation will assist the institution in the administration of Title IV, HEA program funds.

During the course of the review, it was noted that MI has used a variety of formats in conducting student loan entrance and exit counseling. Pamphlets and institutional forms have been provided to students. The institutional forms were not consistent during the award years that were reviewed.

The Department strongly recommends that MI begin to utilize the Department's entrance and exit counseling website – www.studentloans.gov. This tool will provide MI with assurance that all statutory requirements have been met. The Department's site also provides students will have the ability to print a confirmation page. This confirmation page can be included in the students file to verify completion. Additionally, the completion of counseling is captured by the Common Origination and Disbursement System. Finally, the Department's exit counseling tool provides the student with a listing of his/her outstanding student loans by electronically displaying current information housed in the National Student Loan Data System.

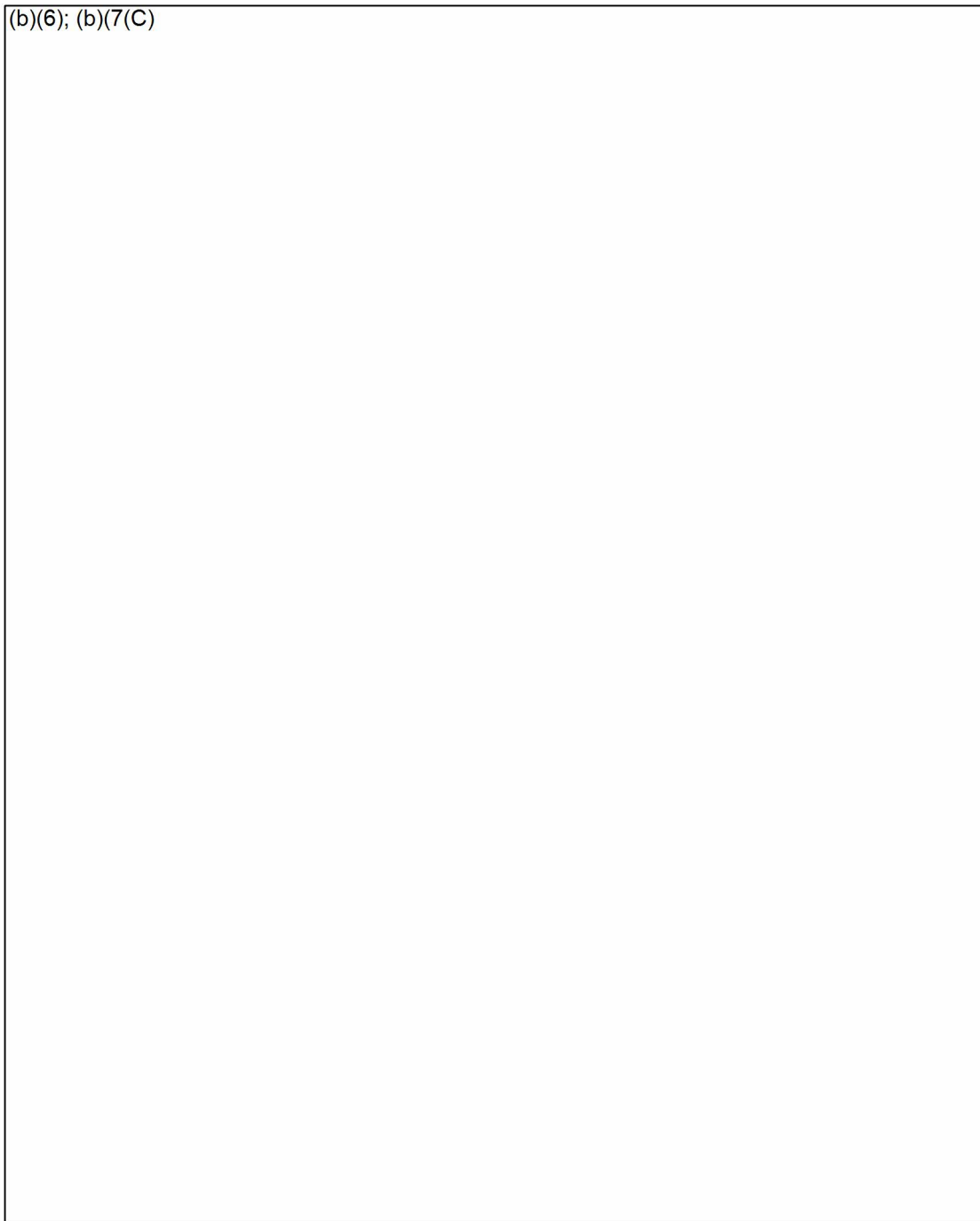
Each of these benefits will enhance MI's compliance, operational and customer service efforts. The Department strongly recommends that MI operationalize this policy/procedure.

Medtech Institute Program Review Samples

2010-2011 Sample

2011-2012 Sample

(b)(6); (b)(7)(C)



PROTECTION OF PERSONALLY IDENTIFIABLE INFORMATION

Personally Identifiable Information (PII) being submitted to the Department must be protected. PII is any information about an individual which can be used to distinguish or trace an individual's identity (some examples are name, social security number, date and place of birth).

PII being submitted electronically or on media (e.g., CD-ROM, floppy disk, DVD) must be encrypted. The data must be submitted in a .zip file encrypted with Advanced Encryption Standard (AES) encryption (256-bit is preferred). The Department uses WinZip. However, files created with other encryption software are also acceptable, provided that they are compatible with WinZip (Version 9.0) and are encrypted with AES encryption. Zipped files using WinZip must be saved as Legacy compression (Zip 2.0 compatible).

The Department must receive an access password to view the encrypted information. The password must be e-mailed separately from the encrypted data. The password must be 12 characters in length and use three of the following: upper case letter, lower case letter, number, special character. A manifest must be included with the e-mail that lists the types of files being sent (a copy of the manifest must be retained by the sender).

Hard copy files and media containing PII must be:

- sent via a shipping method that can be tracked with signature required upon delivery
- double packaged in packaging that is approved by the shipping agent (FedEx, DHL, UPS, USPS)
- labeled with both the "To" and "From" addresses on both the inner and outer packages
- identified by a manifest included in the inner package that lists the types of files in the shipment (a copy of the manifest must be retained by the sender).

PII data cannot be sent via fax.



2839 Paces Ferry Rd.
Suite 400
Atlanta, GA 30339
medtech.edu

October 17, 2012

Mr. Jon Finkelstein
Federal Student Aid
Atlanta School Participation Division
61 Forsyth Street Room 18T40
Atlanta, GA 30303-8918

RE: Program Review Response
OPE ID: 03804400
PRCN: 2012-2-04-27832

Dear Mr. Finkelstein:

Thank you for the opportunity to respond to the Program Review Report dated June 14, 2012. Medtech Institute would also like to thank the team for the courtesy displayed and guidance provided during the program review. Please accept this as Medtech Institute's official response to the Program Review Report.

In this response, Medtech Institute is addressing each finding cited within the Program Review Report and is also addressing the recommendations contained within the report. Medtech Institute is also including the supporting documentation in our enclosed exhibits. Any student specific data follows the required protocol for Personal Identifiable Information (PII).

Medtech Institute reviewed the team's recommendations contained in Section D of the Program Review Report. Medtech Institute agrees with the review team. Beginning April 2012, Medtech Institute implemented www.studentloans.gov for its entrance and exit counseling.

As always, should you have any questions or need any additional information, please contact me directly at 678-486-8353 or via email at eneely@medtech.edu. Thank you for your continued assistance and support.

Sincerely,


Elaine M. Neely
Chief Regulatory Officer
Medtech Institute

be extraordinary 

Finding 11-1 Student Confirmation Report Filed Late/Inaccurate/Missing

Noncompliance: During the course of the program review, several students were identified with late and/or inaccurate enrollment reporting.

Required Action: Based upon the error rate of this finding the school must conduct a 100% file review of enrollment reporting for students who attended MI during the 2010-2011 and 2011-2012 award years (including students identified in the Program Review Sample). MI must correct any errors discovered in the file review and report the outcomes to the Department as part of MI's Program Review Report response. The results of this review must be provided in EXCEL or similar spreadsheet format (separated by award year) and contain the following fields:

1. Student's Name
2. Student's SSN
3. Enrollment Reporting Correct or Incorrect
4. Detail Regarding Correction – If Correct – N/A
5. Date of Correction
6. Reason for Error – N/A if Correct

Medtech Institute's Response

Medtech Institute (Medtech) completed the full file review for each student and updated each student's status in NSLDS, as necessary

During the award years covered in the Program Review, Medtech Institute utilized a third-party servicer, GLOBAL Financial Aid Services. As part of the third-party agreement, GLOBAL submitted the NSLDS enrollment reporting information for Medtech Institute. Medtech Institute manually updated a roster and provided the roster to GLOBAL for transmission.

Medtech Institute understands the importance of timely and accurate reporting to NSLDS. As a result of the citation of this finding, Medtech Institute changed its process. Medtech Institute now updates and transmits its own enrollment data to NSLDS by utilizing its internal system of record, CampusVue. Medtech Institute maintains up to date records for each student. By utilizing the internal system of record, Medtech Institute insures the accurate and timely submission of the enrollment data. In addition, to further ensure timely reporting, Medtech Institute transitioned to a monthly (every 30 day) reporting cycle for NSLDS reporting rather than a 60 day reporting cycle.

As instructed in the Program Review Report, Medtech Institute conducted a 100% file review for each student in the 2010-2011 and the 2011-2012 award years. The results of this review are contained in the requested spreadsheet (**Exhibit A**). We are providing the print screens for each student requiring a correction in hard copy (via overnight delivery) to Mr. Finkelstein.



Medtech Institute also conducted a review of its policies and procedures regarding enrollment reporting.

Attached is the NSLDS Reporting Procedure (**Exhibit B**).



Finding 11-2 Return to Title IV (R2T4) Calculation Errors

The Department of Education removed this finding from the report.

Finding 11-3 Incorrect Federal PELL Grant Calculation/Clock Hour or Institution without Fixed Terms – Incorrect Proration

Noncompliance: During the course of the review, Medtech submitted copies of Program Modification applications that were submitted to The Council on Occupational Accreditation (COE) on June 28, 2011. The purpose of these applications was to modify the number of clock hours in MI's programs to include course preparation hours (homework hours). These applications were approved by COE on 3/15/2012. The Medical Office Expert – Administrative and Medical Office Expert – Clinical programs were approved for an additional 166.25 course preparation hours bringing the total number of clock hours for the program to 886.25 (720 + 166.25). The clock to credit hour conversion formula for these programs is $886.25/25 = 35.45$. Medtech rounded this up to 36 credit hours. Federal Regulations do not allow rounding up. The correct credit hours for these programs are 35.

Required Action: Based on the COE approval of MI's application to modify programs to include out of class preparation work, Medtech must calculate student eligibility using the total allowable clock hours provided by COE in its Program Modification Approval letter.

Based upon the error rate of this finding, Medtech must conduct a 100% file review of students who were enrolled in the Medical Office Expert – Administration and Medical Office Expert – Clinical programs with a start date on or after July 1, 2011. The review must include students that were included in the Department's program review. MI must identify any over-awards discovered in the file review and report the outcome to the Department as part of MI's Program Review Report response. The results of this review must be provided in Excel or a similar spreadsheet format (separate by award year) and contain the following fields:

1. Student's Name
2. Student's SSN
3. Incorrect Pell Disbursement
4. Correct Pell Disbursement
5. Amount of Overaward

MI must submit a revised copy of each affected student's ledger. In addition, MI must revise its awarding policy/procedures to ensure future compliance. The revised policy/procedures document must be submitted in response to this Program Review Report.

Medtech Institute's Response

As a result of the financial aid clock to credit conversion, students in the Medical Office Expert – Clinical Program (MOEC) and the Medical Office Expert – Administrative Program (MOEA) programs received financial aid based on 36 credits rather than 35 credits.



As instructed in the Program Review Report, Medtech Institute conducted a 100% file review for all students enrolled in this program. The results of the 100% file review are contained in **Exhibit C**. Medtech Institute is awaiting further instructions from the review team and will return the necessary funds to the Federal Pell Grant Program for each student affected. Medtech Institute will provide copies of student ledger cards once the refunds are made.

Medtech Institute reviewed and revised its Awarding of Title IV funds policy (**Exhibit D**). Medtech Institute has conducted training with the necessary Financial Aid Office associates to ensure a clear understanding of the required financial aid clock to credit hour conversion to ensure that all students receive the correct amount of federal student financial aid.

Finding 11-4 Improper Award – Direct Loan Not Prorated Accurately

Noncompliance: During the course of the review, Medtech submitted copies of Program Modification applications that were submitted to The Council on Occupational Accreditation (COE) on June 28, 2011. The purpose of these applications was to modify the number of clock hours in MI's programs to include course preparation hours (homework hours). These applications were approved by COE on 3/15/2012. The Medical Office Expert – Administrative and Medical Office Expert – Clinical programs were approved for an additional 166.25 course preparation hours bringing the total number of clock hours for the program to 886.25 (720 + 166.25). The clock to credit hour conversion formula for these programs is $886.25/25 = 35.45$. Medtech rounded this up to 36 credit hours. Federal Regulations do not allow rounding up. The correct credit hours for these programs are 35.

Required Action: Based on the COE approval of MI's application to modify programs to include out of class preparation work, Medtech must calculate student eligibility using the total allowable clock hours provided by COE in its Program Modification Approval letter.

Based upon the error rate of this finding, Medtech must conduct a 100% file review of students who were enrolled in the Medical Office Expert – Administration and Medical Office Expert – Clinical programs with a start date on or after July 1, 2011. The review must include students that were included in the Department's program review. MI must identify any over-awards discovered in the file review and report the outcome to the Department as part of MI's Program Review Report response. The results of this review must be provided in Excel or a similar spreadsheet format (separate by award year) and contain the following fields:

1. Student's Name
2. Student's SSN
3. Incorrect Direct Loan Award
4. Correct Direct Loan Award
5. Amount of Over-award (net amount after origination fee)

MI must submit a revised copy of each affected student's ledger. In addition, MI must revise its awarding policy/procedures to ensure future compliance. The revised policy/procedures document must be submitted in response to this Program Review Report.

Medtech Institute's Response

As a result of the financial aid clock to credit conversion, students in the Medical Office Expert – Clinical Program (MOEC) and the Medical Office Expert – Administrative Program (MOEA) programs received financial aid based on 36 credits rather than 35 credits.



As instructed in the Program Review Report, Medtech Institute conducted a 100% file review for all students enrolled in this program. The results of the 100% file review are contained in **Exhibit E**. Medtech Institute is awaiting further instructions from the review team and will return the necessary funds to the Federal Pell Grant Program for each student affected. Medtech Institute will provide copies of student ledger cards once the refunds are made.

Medtech Institute reviewed and revised its Awarding of Title IV funds policy. (**Exhibit D**) Medtech Institute has conducted training with the necessary Financial Aid Office associates to ensure a clear understanding of the required financial aid clock to credit hour conversion to ensure that all students receive the correct amount of federal student financial aid.



Finding 11-5 Inadequate Recordkeeping

Noncompliance: Disbursement dates reported to the Common Origination and Disbursement System (COD) did not always match dates that funds were credited to student ledgers. This issue becomes especially critical for loan recipients, as the disbursement date reported to COD is vital in the lender's determination of an accurate repayment start date.

During the course of the review, students 4, 8, 20, 22, and 27 were identified as having conflicting COD and account ledger disbursement dates. During the course of the review students 10, 21, 23 and 29 were identified as having incorrect loan disbursement status codes (disbursed, pending, canceled) in COD.

Required Action: The institution must review its COD reporting procedures to determine the cause of the discrepancies. Procedures must be updated to ensure that disbursement dates reported to COD are the same as the date that funds are credited to student accounts. Procedures must also be updated to ensure that disbursement status codes are accurate. In response to this Program Review Report, MI must include a written update of its COD reporting procedures.

Medtech Institute's Response

Medtech Institute used a third-party servicer during the award years in question. Based on the processing cycle of the third-party the timing of Medtech Institute's request for funds and the servicer's transmission and notification times, the students' disbursement dates in COD did not match the disbursement dates on student ledger cards.

Medtech Institute made the decision to process financial aid internally without the assistance of a third-party service beginning with the 2012-13 award year. Medtech Institute now transmits all records to COD on a daily basis. As each disbursement approval is received from COD, Medtech Institute ensures the funds are posted to the student's ledger cards the same day. This process ensures accuracy between the disbursement dates on the student ledger cards and the disbursement dates reported to COD.

Enclosed is the Electronic Processing Procedure (Exhibit F).



Finding 11-6 Verification Violations

Noncompliance: During the course of the review, one student (student 10) had conflicting information between the FAFSA, Parents' Federal Tax Return and the Explanation of Low Income Status Form. The discrepancies are as follows:

- 2010-2011 ISIR lists 3 in the household and parent's marital status as single
- 2009 1040A was filed as married filing jointly with 4 exemptions
- Explanation of Low Income Status Form states that the student lives with an Aunt who provides all of her support

There is no documentation in the file to indicate that MI took the necessary steps to resolve the conflicting information. Parental marital status was not confirmed and there was no attempt to determine if the Aunt had legal guardianship, i.e., eligible for a dependency override.

Required Action: The institution must adjust its verification policy/procedures to prevent a reoccurrence of similar violations. Discrepant data must be identified and corrected/documented in the verification process. Continued violations may result in incorrect student aid determinations that could prove harmful to the student and/or the Department.

In its response to this Program Review Report, MI must submit a written update of its verification policies and procedures document.

Medtech Institute's Response

Medtech Institute takes the verification requirements seriously and wants to reassure the US Department of Education that each financial aid associate reviews each student file to ensure no discrepant data is contained in the file. In addition, Medtech Institute established a Quality Assurance team which performs a secondary review of each student file to ensure verification is completed correctly and any discrepant data is resolved prior to requesting or disbursing Title IV funds.

Beginning with the 2012-2013 award year, Medtech Institute now processes all financial aid and conducts all file reviews internally and without the assistance of a third-party servicer. Please find enclosed our Verification Policy (**Exhibit G**) and Verification Procedure (**Exhibit G1**).



Finding 11-7 Return of Title IV Funds (R2T4) Made Late

Noncompliance: During the course of the review, two students were identified with a late R2T4 calculation. Pell Grant and Stafford Loan returns were included in the R2T4 calculation. The Pell Grant return was timely. The Stafford loan return was late.

Required Action: An institution must return the amount of Title IV funds for which it is responsible as soon as possible but not later than 45 days after the date of the institution's determination that the student withdrew. Continued violations may result in undue cost to the Department. In response to this program report MI must review and revise its R2T4 policy/procedures to ensure that repeat violations are avoided.

Medtech Institute's Response

Medtech Institute understands the importance of returning unearned funds based on the R2T4 calculation, within the allowable timeframe. Medtech Institute feels the discrepancies in the return of funds for the two students cited are isolated incidents.

To ensure the accurate and timely return of Title IV funds Medtech Institute reviewed and strengthened its Return Of Title IV Funds (R2T4) Policy Credit Hour And Clock Hour Programs (Exhibit H).

Medtech Institute has changed the process of how and when withdrawn students are identified. The Campus Support Center has developed an internal system report which identifies students who have withdrawn. The Finance Department produces and monitors the report each week. In addition, Medtech Institute processes R2T4 calculations and completes the actual return of funds within a week of identifying the student has withdrawn. The Finance Department monitors the completion of the R2T4 and return of funds each week against the system report identifying each student by their withdraw date and date of determination. These changes will ensure compliance with refund guidelines.



Title IV credit balance regulations with the individual to ensure a clear understanding of the regulatory requirements.

Although the program review response requested that we change the form, in subsequent conversations between Mr. Finkelstein and Amy Kienitz, Mr. Finkelstein stated that the form did not need to be changed. Rather, this was an isolated incident and he wanted us to ensure that the individual had been properly trained. We reviewed the error with the individual and provided the training needed. Additionally as a result of the program review, we reviewed our policies and procedures, including the actual form and made changes to strengthen both.

Enclosed is the revised Student Title IV Credit Balance Policy (**Exhibit I**) and the revised Student Authorization for Title IV Credit Balances form (**Exhibit I.1**).



Finding 11-8 Student Credit Balance Deficiencies

Noncompliance: The section of MI's Student Authorization form (Authorization to Refund Title IV Funds) states the following: "In the event of my withdrawal, please refund any credit balance to my student loan."

I understand that I may modify or cancel this authorization at any time and the credit balance on my account will be issued to me in full within 30 days of the cancellation of this authorization."

Per federal regulations, if a student or parent cancels an authorization to hold title IV, HEA program funds under paragraph (b)(1)(iii) of this section, the institution must pay those funds directly to the student or parent as soon as possible but no later than 14 days after the institution receives that notice.

Student 26 (Esther Norman) signed a Student Authorization form on 6/29/2011 that allowed MI to retain credit balances to cover educational expenses that will occur prior to the end of the academic year and to refund a credit balance to a student loan in the case of withdrawal.

On 11/4/2011 the student had a credit balance of \$225.00 as a result of the disbursement of Title IV Funds. On 11/5/2011, MI applied the credit balance to the student's private loan (Tuition Options). This payment was not authorized by the student. Federal regulations stipulate that the credit balance must be returned to the student within 14 days if the school does not acquire proper authorization.

Required Action: Medtech must revise its Student Authorization form to update the section under "Authorization to Refund Title IV Funds".

MI must submit a revised copy of the Student Authorization to Refund Title IV Funds form to the Department. In addition, MI must revise its policy/procedure to ensure future compliance. The revised policy/procedures document must be submitted in response to this Program Review Report.

Medtech Institute's Response

Medtech Institute reviewed the finding and the one instance cited in the Program Review Report. Medtech Institute believes that this is an isolated incident. The individual processing the credit balance made an error when returning the credit balance. The individual returned the credit balance to the student's private loan which had a higher interest rate in an attempt to do what was best for the student. Medtech Institute conducted training and reviewed the



EXHIBIT B NSLDS REPORTING PROCEDURE

INTRODUCTION:

The U. S. Department of Education (ED) requires all institutions approved to participate in the Federal Student Aid programs to report student status information to the National Student Loan Data System (NSLDS). Student enrollment information is important because ED uses the information to determine if the student is still considered in school, must be moved into repayment, or is eligible for an in-school deferment.

FEDERAL AUTHORITY:

34 CFR 682.610 FFEL

34 CFR 685.309(b) Direct Loans

"Dear Colleague" Letter GEN-95-7

"Dear Colleague" Letter GEN-96-17

DEFINITIONS:

National Student Loan Database (NSLDS): The National Student Loan Data System is the ED's central database for student aid.

PDA: The Primary Destination Point Administrator manages the National Student Loan Database access for all Financial Aid Associates.

Student Status Confirmation Report (SSCR): A report used by institutions to update student status data in NSLDS.

PROCEDURE:

Medtech College and Institutes (Medtech) will comply with all NSLDS reporting requirements. Medtech will meet all deadlines and provide accurate reporting information to NSLDS by following the outlined process below.

1. NSLDS will transmit the roster file via the EdConnect Software to the Medtech Campus Support Center on the 1st of each month for every campus.
2. Open the EdConnect software and login using the FSA User ID and password. Once logged in, click on the transmission icon. A message will appear indicating the transmission was successful. Should an error message be received contact the NDFA or the Vice President of Financial Services (VPFS).
3. If an error does not occur;
 - a. Open the mailbox query by clicking on the mailbox query icon. A list of all available files for import will be found.
 - b. Select each file to import by clicking on the open box to the left of the file name.
Note: The file name for NSLDS files is "SSCR Roster."
4. The NDFA imports the file into CampusVue using the "SSCR Process" functionality. The SSCR Process can be found in CampusVue by selecting:
 - a. Daily

- b. Financial Aid
 - c. SSCR Process
 - d. Choose "Process SSCR Roster File"
 - e. Select next
 - f. A list of all SSCR Roster files will be available to import by selecting "Find Roster File."
 - g. Choose the file to be imported
 - h. Select "Match Roster File"
5. This process generates a roster file containing the most current student status information as it is reported in CampusVue. The NDFA submits this roster to ED within 72 hours of receipt of the roster files.
6. The NDFA uploads and transmits the file back to NSLDS via the EdConnect software when step six is completed.
 - a. Log into EdConnect again
 - b. Click on the Transmission Queue icon
 - c. Choose the cell "File Name" and select the drop down arrow
 - d. This will display a list of all files
 - e. Find the file name generated in step six and select it
 - f. It will now display highlighted in yellow in the transmission queue
 - g. Repeat this step for each file to be returned
 - h. Once all files are selected, perform a transmission again
 - i. The files have now been transmitted for processing
7. Upon receipt of the processed file, NSLDS reviews the file and generates an error notification file. NSLDS returns the "error notifications" to the Campus Support Center via EdConnect within 7 days.
8. The NDFA will repeat steps three through eight. The only difference will be the file type to be imported and processed. The NDFA imports the "SSCR Error File." In CampusVue, the NDFA selects "Process SSCR Error Notification" and the corresponding output files will be titled "SSCR Error Return."
9. The NDFA corrects the errors and transmits the corrected file back to NSLDS within 3 business days.
10. Occasionally, the NDFA may be required to update student status information directly on the NSLDS website. This is needed when a student has an error after the error files are returned and imported using the steps previously outlined for error returns.



EXHIBIT D AWARDING TITLE IV FUNDS POLICY

INTRODUCTION:

It is the responsibility of Medtech Financial Aid Associates to accurately calculate and award federal financial aid to all eligible students in a timely manner. Financial Aid Associates will review, award and package each student on a case by case basis, based on each student's eligibility as determined by the Cost of Attendance (COA), Expected Family Contribution (COA), financial need and estimated financial assistance..

FEDERAL AUTHORITY:

- 34 CFR 600.2 Institutional Eligibility Under The Higher Education Act of 1965
- 34 CFR 668.3 Academic Year Definition Under the Higher Education Act of 1965
- 34 CFR 668.4 Payment Periods Under the Higher Education Act of 1965
- 34 CFR 690.62 Calculation of Federal Pell Grants Under the Higher Education Act of 1965

DEFINITIONS:

Free Application for Federal Student Aid (FAFSA): Annual application a student must complete to receive federal student aid.

Expected Family Contribution (EFC): The expected family contribution is determined based on the information supplied in the Free Application for Federal Student Aid (FAFSA). It is the amount the family can reasonably afford to pay for college based upon the federally mandated calculation.

Financial Need: Financial Need is defined as Cost of Attendance less the Expected Family Contribution. In general, financial aid awards should not exceed the student's financial need.

Institutional Student Information Record (ISIR): Data provided by the Central Processing System after the student submits the FAFSA. Information contains the student's expected family contribution which is used to determine aid eligibility.

Cost of Attendance (COA): The cost of attendance for a student is an estimate of that student's education expenses for the period of enrollment. Costs included in the COA are tuition, fees, room, board, books, and miscellaneous expenses.

POLICY:

Medtech Colleges and Institutes' (Medtech) Awarding Title IV Funds Policy will comply with all the Department of Education requirements. The policy encompasses defining academic year requirements, calculating individual award amounts, determining financial need and awarding Federal Funds in the appropriate order.

1. Medtech defines the Academic Year in the following manner:
 - a. 24 semester or trimester credit hours/30 weeks
 - b. 36 quarter credit hours/30 weeks

c. 900 clock hours

*If any program does not meet the definition of an academic year all aid must be prorated appropriately.

2. Medtech determines financial need based on Cost of Attendance (COA) less Expected Family Contribution (EFC)
3. Medtech will calculate Federal Pell Grants according to the most recent Pell payment schedules published by the Department of Education. The Pell Grant award may be prorated if the student is enrolled in a program which does not meet the definition of an academic year.
4. Medtech will calculate Direct Stafford Loans based on the following
 - a. Amount the borrower requests
 - b. Borrower's cost of attendance
 - c. Borrower's maximum borrowing limit based on grade level
 - d. Borrower's annual maximum lifetime borrowing limit
5. Student's will be awarded aid in the following order:
 - a. Federal Pell Grant
 - b. Federal Supplemental Education Opportunity Grant
 - c. Federal Direct Subsidized Stafford Loan
 - d. Federal Direct PLUS Loan
 - e. Federal Direct Unsubsidized Stafford Loan



EXHIBIT F

ELECTRONIC PROCESSING PROCEDURE

INTRODUCTION:

Effective with the 2012-13 Financial Aid Year, Medtech Colleges and Institutes (Medtech) will process all Title IV Federal Financial Aid records electronically. This procedure provides the steps to complete the new data transmission process for Pell and Direct Loan records. Prior to the 2012-13 year, Medtech used the services of Global Financial Aid Services.

DEFINITIONS:

Common Origination and Disbursement System (COD): The U.S. Department of Education (ED) repository system for all origination and disbursement records for federal funds. This system maintains a record of funds disbursed by school, fund source, dollar amount and student specific details for origination and disbursements.

Heightened Cash Monitoring 1 (HCM1): A funding method utilized by the ED. Under HCM1, schools must first post funds to student ledger cards prior to receiving the actual funds from the appropriate federal fund source.

G5: The ED system where schools request and return federal funds which are/have been disbursed to students, by individual campus fund sources.

PROCEDURE:

General Information:

1. The Quality Assurance (QA) Team must review and approve the financial aid file. The National Director of Financial Aid (NDFA) transmits all required data from CampusVue to COD.
2. Financial aid awards are processed by the campus Financial Aid associates and all data is maintained in the CampusVue system.
3. Medtech originates Pell Grants for the full scheduled award.
4. The NDFA batches origination and disbursements records in CampusVue and transmits the records to COD via the EdConnect software
5. The NDFA is responsible for all data transmissions.

Procedure:

1. The QA Team creates CampusVue batches of fund sources approved for disbursement. The QA Team will notify the campus Directors of Financial Aid (DFAs) of the specific batches created by fund source for each school. The campus DFAs, upon notification of the batch, are required to review all students in each batch for eligibility and accurate disbursement amounts within 4 business hours of receiving the notification from the QA Team.
2. The campus DFA must remove any student deemed not eligible from the batch. Upon removal of any ineligible students, the DFA marks the batch, in CampusVue, as "reviewed." The NDFA transmits the batch to the COD within 24 hours of the DFA's review. COD returns

the electronic origination and disbursement approval for each batch, typically within 24 hours.

3. The NDFA imports the approvals into CampusVue.
4. Once the NDFA receives the disbursement approval he creates a batch control ticket the same day. The batch control ticket contains the campus, fund source, dollar amount approved, CampusVue batch id, and the G5 fund source identification number.
5. The NDFA forwards the batch control tickets and the rosters to the National Business Office Manager (NBOM).
6. The NBOM posts the individual batches to the student ledger cards via a CampusVue process.

Note: All Medtech campuses are required to adhere to the HCM1 processes defined by ED. This process requires Medtech to post funds to the student account prior to the draw of funds from the G5 system.

7. The NBOM posts the batch, dates the batch control ticket with the posting date, initials the ticket and forwards it to the Vice President of Financial Services (VPFS) to complete the draw of funds.
8. The elapsed time between COD disbursement approval and the actual posting of the award to the student ledger card is typically 48 hours. This ensures timely delivery of federal funds to the student's accounts.
9. The VPFS requests the funds from the G5 system for the individual amounts listed on the batch control ticket for each school. The VPFS initials the batch control ticket and documents the date of the draw.
10. The VPFS prints a copy of the G5 confirmation of the fund draw and forwards the batch control ticket and the G5 Confirmation back to the NBOM.
11. The NBOM verifies that the VPFS requested the correct amounts and that the same amounts are deposited to the Campus Fed Funds Bank Account.
12. The NBOM scans the Roster, Batch Control ticket and G5 confirmations via ImageNow to maintain an electronic copy of the transaction and also maintains a paper copy.



EXHIBIT G VERIFICATION POLICY

INTRODUCTION:

The U.S. Department of Education (ED) requires schools to perform a process called verification for students who are selected by the Central Processing System (CPS). The CPS will identify students based on the FAFSA data the students submitted.

Campuses must assist students and complete the verification process prior to disbursing federal student aid. If the Financial Aid staff discovers any error during the verification process, the school must update the ISIR information and receive a corrected ISIR prior to disbursing aid. If the error cause a change in the student's eligibility, the school must review and adjust the student's aid accordingly prior to requesting or disbursing funds.

FEDERAL AUTHORITY:

34 CFR 668.51.61 Verification of Student Aid Application Information
Application and Verification Guide, 2012-2013 Federal Student Aid Handbook

DEFINITIONS:

Free Application for Federal Student Aid (FAFSA): An annual award year specific application form students must complete to receive federal student financial aid. The ED uses the information provided to determine the Expected Family Contribution (EFC) and the students' eligibility for aid. .

Institutional Student Information Record (ISIR): An electronic report generated by CPS based on the FAFSA data submitted by the student. Information contains the student's expected family contribution which is used to determine aid eligibility.

Title IV Federal Student Financial Aid: Federal funding provided to students to assist them with educational expenses. Title IV Federal Student Financial Aid includes grants, loans and self-help (Federal Work Study):

1. PELL Grant,
2. Federal Supplemental Education Opportunity Grant,
3. Federally subsidized loans,
4. Federally unsubsidized Loans and Parent Loans
5. Federal Work-Study

The Iraq and Afghanistan Service Grant: Non-need-based grant which is not subject to verification.

PROVISIONS:

Institutions are required to complete verification for applicants selected by the Central Processing System (CPS) prior to disbursing federal student aid. The Medtech Colleges and Institutes' (Medtech) policy regarding verification is as follows:

1. Medtech Financial Aid associates will verify all ISIR's selected by the CPS and may choose to verify any other ISIR if, they believe the information supplied by the student, spouse or parent may be incorrect.
2. Medtech will identify ISIR's selected for verification and contact the student to request the verification documentation with 48 hours.
3. Medtech will contact selected students via the Student Portal, student email, in person, or by telephone.
4. Students are expected to supply the required verification documents timely upon request within two weeks of the financial aid department request.
5. Medtech will accept the verification documents (for PELL Grants) until June 15th of the award year in which the student is selected for verification, but may accept the documentation later, based on unusual circumstances. For loans, Medtech will accept verification up to two weeks before the end of the student's scheduled loan period.
6. If the Medtech Financial Aid Department receives tax returns for a student who is not selected for verification by CPS, the FA associate must review the tax return, confirm that the data on the ISIR is correct, resolve any discrepancies and maintain the tax return in the students file.
7. The student will not receive any disbursement of Title IV funds until verification has been completed.
8. During the verification process the Financial Aid associate must correct any conflicting information (The verification procedure from the Medtech Financial Aid Manual is attached to this policy.) All corrections must be documented in the student's file. Corrections may require a student acknowledgement and/or additional supporting documentation.
9. If the corrections to the ISIR changes the student's eligibility, the Financial Aid associate will schedule a follow-up meeting with the student.
10. If the campus determines that an applicant for may have engaged in fraud or other criminal misconduct in connection with his/her application, the campus will immediately notify the VPFS. The VPFS will review the documentation and, if warranted, refer the applicants case to the U. S. Department of Education's Office of Inspector General (OIG).

EXHIBT G 1

Verification Procedure

If a student/applicant is selected for verification, the Financial Aid associate must complete the verification process prior to disbursing federal student aid. The steps below outline the Financial Aid associates tasks to complete verification.

1. In CampusVue, search for the student and open the Student Master
2. Select the Financial Aid tab on left menu
3. Select the ISIR menu
4. This will bring up the list of ISIRs for the selected student
5. Make sure the correct Award Year is selected
6. Select the highest ISIR Transaction number

ISIR ID	Date Received	EFC	Recalc EFC	Pell Elig	Verification	Verification Complete	Match
ISIR1	12/1/2011	04877		Y	Y	N	Yes
ISIR2	1/10/2012	05188		Y	Y	N	Yes

Code Type	Codes	Comments
C Codes:		
Reject Codes:		
Comment Codes:	901, 149, 170, 001, 118, 117, 113, 005	
School Codes:	007362	

SSN Search: [] Award Year: [2011-12] Verification Corrections Print ISIR Close

Div. Lic State: [] DL #: [] DBI Date: [] Print Data Block: []

Edit Save Cancel Close

7. Then select Verification

EXHIBT G 1

ISIR Verification

Original SSN:

Current SSN:

Award Year: 2011-12

Last

First

MI

Transaction: TH02

Student Name

(b)(6); (b)(7)(C)

Model: Dependent

Verification

History

	ISIR	Verification	Difference
1. Student's Tax Return Filed?	1		
2. Student's Type of 2010 Tax Form Used?	2		
a. Tax Return Signed and Dated?			
3. Student's Adjusted Gross Income	13294		
4. Student's U.S. Income Tax Paid	758		
5. Student's Income Earned From Work	13294		
6. Spouse's Income Earned From Work			
7. Student's Educational Credits	0		
8. Student's Child Support Paid	0		
9. Student's Need-Based Employment	0		
10. Student's Grant/Scholarship Aid	0		
11. Student's Combat Pay	0		
12. Student's Co-op Earning Pay	0		
13. Student's Pension Payments	0		
14. Student's IRA Payments	0		
15. Student's Child Support Received	0		
16. Student's Interest Income	0		
17. Student's IRA Distributions	0		
18. Student's Untaxed Pensions	0		
19. Student's Military/Clergy Allowances	0		

Save

Cancel

Close

Finish

8. Compare the Tax Transcript, Verification Worksheet and any other supporting documentation to the ISIR information and enter the corresponding numbers under the Verification column.
9. If the amount in the Verification column is different than the amount in the ISIR column, CampusVue populates the "Difference" column.

EXHIBIT G 1

ISIR Verification

Original SSN:

Current SSN:

Award Year: 2011-12

Last

First

MI

Transaction: TH02

Student Name: (b)(6); (b)(7)(C)

Model: Dependent

	ISIR	Verification	Difference
1. Student's Tax Return Filed?	1	1	
2. Student's Type of 2010 Tax Form Used?	2	2	
a. Tax Return Signed and Dated?			
3. Student's Adjusted Gross Income	13294	14000	706
4. Student's U.S. Income Tax Paid	758		
5. Student's Income Earned From Work	13294		
6. Spouse's Income Earned From Work			
7. Student's Educational Credits	0		
8. Student's Child Support Paid	0		
9. Student's Need-Based Employment	0		
10. Student's Grant/Scholarship Aid	0		
11. Student's Combat Pay	0		
12. Student's Co-op Earning Pay	0		
13. Student's Pension Payments	0		
14. Student's IRA Payments	0		
15. Student's Child Support Received	0		
16. Student's Interest Income	0		
17. Student's IRA Distributions	0		
18. Student's Untaxed Pensions	0		
19. Student's Military/Clery Allowances	0		

Save

Cancel

Close

Finish

10. If there is a difference that is greater than the ED tolerance of \$25.00, then an ISIR Correction is necessary. If this occurs, CANCEL the Verification and perform an ISIR Correction. Please see the ISIR Correction Section of this manual.

If the amounts are within tolerance, complete entering all required amounts in the Verification column. Select **SAVE**. **DO NOT SELECT FINISH!**

11. Verification is complete.



EXHIBIT H
RETURN OF TITLE IV FUNDS (R2T4) POLICY
CREDIT HOUR AND CLOCK HOUR PROGRAMS

INTRODUCTION:

Federal regulations require campuses to determine the earned and unearned portion of Title IV aid for students who cease attendance or students who fail all classes as a result of not completing each course within a payment period. The Return of Title IV Funds Policy establishes the requirements a campus must follow to ensure accurate and timely processing of return calculations for affected students.

FEDERAL AUTHORITY:

34 CFR 668.22 and 34 CFR 668.22(f)(ii)

Federal Student Aid Handbook, 2012-2013, Volume 5, Chapter 1, Withdrawals and the Return of Title IV Funds

DCL GEN04-03, February 2004

DEFINITIONS:

Date of Determination: The date the campus determines a student is withdrawn. This may be official or unofficial.

1. **Official Withdrawal:** The date the student initiates the withdrawal process.
2. **Unofficial Withdrawal:** The date the campus determines the student ceased attendance.

Failing Grades: Students who do not attend the last fourteen class days and fail to earn a passing grade in at least one of the classes within the payment period must be assumed to be withdrawn for Title IV purposes, unless the campus can document the student completed the period.

Order of Return of Funds: Campuses must return Title IV funds, as required by the R2T4 calculation, to the programs from which the student received aid during the payment period or period of enrollment, in the following order, up to the net amount disbursed from each source:

1. Unsubsidized Direct Stafford Loans
2. Subsidized Direct Stafford Loans
3. Federal Perkins Loans
4. Direct PLUS loans
5. Federal Pell Grants
6. Federal Supplemental Education Opportunity Grants (FSEOG)
7. Federal Teach Grants
8. Iraq and Afghanistan Service Grant

PROVISIONS:

Federal regulations require campuses to perform a R2T4 calculation for any eligible Title IV recipient who withdraws during the payment period or period of enrollment.

Students, in credit hour programs (term or nonterm), who do not attend the last fourteen class days and earn an F grade in all classes are considered withdrawn by the campus.

Students, in clock hour programs, who fail to complete all clock hours of instructional time within the payment period or period of enrollment will be withdrawn by the campus. Students who do not attend the last fourteen class days and earns an F grade in all classes are also considered withdrawn by the campus.

Campuses must perform the R2T4 for all withdrawn students within **thirty (30)** calendar days of the date of determination. The campus must perform the R2T4 calculation based on the student's last date of attendance. Campuses must return all required federal aid funds to the proper Title IV program within **forty-five (45)** calendar days of the student's date of determination.

Credit Hour Programs (Term):

The campus uses calendar days to determine the percentage of the period completed by a student who withdraws from a credit hour program.

The campus determines the percentage of the period completed by dividing the number of calendar days completed in the period, by the total calendar days in the period. The campus uses the student's last date of attendance to calculate the number of days completed. The campus excludes any schedule break of at least five consecutive days.

$$\frac{\text{Number of calendar days completed in the period}}{\text{Total calendar days in the period}}$$

Credit Hour Programs (Nonterm – offered in modules):

The campus uses calendar days to determine the percentage of the period completed by a student who withdraws from a nonterm credit hour program.

If a student fails a module, the campus must project the completion date of the payment period based on the student's progress. The campus must use the student's withdrawal date to determine the total number of calendar days within the period. When a student fails a course or module during the payment period the campus must extend the payment period by an additional module.

The campus determines the percentage of the period completed by dividing the number of calendar days the student completed in the payment period by the total number of calendar days in the payment period. The campus uses the student's last date of attendance to calculate the number of days completed. The campus excludes any scheduled break of at least five consecutive days.

$$\frac{\text{Number of calendar days completed in the period}}{\text{Total calendar days in the period}}$$

Clock Hour Programs:

The campus uses scheduled hours to determine the percentage of the period completed by the student who withdraws from a clock hour program.

The campus determines the percentage of the period completed by dividing the number of hours the student was scheduled to complete in the payment period or period of enrollment, by the total number

of overall clock-hours in the same period. The campus uses the student's last date of attendance to calculate the number of days completed. The campus excludes any scheduled break of at least five consecutive days.

Number of clock hours the student was scheduled to complete in the period
Total number of clock hours in the period



EXHIBIT I

STUDENT TITLE IV CREDIT BALANCE POLICY

INTRODUCTION:

Federal Student Aid (FSA) regulations require schools to identify and resolve student account credit balances caused by federal aid within 14 calendar days of determining a student is no longer enrolled. A Title IV credit balance is created when the amount of federal aid exceeds the allowable charges. Schools may obtain a student authorization to retain credit balances within the award year; however, all academic year credit balances must be resolved within 14 days of the end of the academic year.

FEDERAL AUTHORITY:

34 CFR 668.164(c) Disbursing Funds, Direct Payments

34 CFR 668.164(e)(1)&(2) Disbursing Funds, Credit Balance

Federal Student Aid Handbook, 2012-2013, Volume 4, Chapter 1, Disbursing FSA Funds

DEFINITIONS:

Title IV Credit Balance: A credit balance is the result of Title IV funds exceeding the charges for the payment period.

PLUS Loans: Federal Loans made to the Parents of Undergraduate, Dependent Students.

PROCEDURE:

Medtech Colleges and Institutes (Medtech) adhere to the FSA requirements regarding Title IV credit balances. The campus must return Title IV credit balances within 14 days of the creation of the credit balance. A campus may retain the credit balance to assist students in managing their funds with authorization from the student. The Medtech policies regarding student account balances are listed below.

1. The Financial Aid Associate (FAA) provides all students with the authorization form to allow the student to direct the campus concerning any credit balances which may occur on their account.
2. Medtech, upon a student's selection on the authorization form, will return the credit balance to the student or parent as soon as possible, but no later than 14 days after the date the balance occurred on the student's account, if the balance occurred after the first day of a payment period.
3. Medtech, with student authorization, may retain the credit balance on the student's account during the academic year.
4. Medtech will return a credit balance, created by PLUS Loan funds to the Parent borrower unless the parent has given authorization in writing that the excess funds may be given to the student.

5. Medtech provides students with the option of receiving their excess funds in the form of a debit card or paper check. No fees are charged for the debit card. If the student chooses a paper check, the check is printed and mailed to the student's address listed in the CampusVue system within 14 days of the student's request for the paper check.
6. Medtech will resolve any student credit balances, regardless of the student's authorization in the following circumstances:
 - a. The student is at the end of a payment period
 - b. The student is at the end of a loan period
 - c. The student is scheduled to graduate
 - d. Within 14 days of funds disbursing and the student is not enrolled
 - e. Based on the Return to Title IV (R2T4) calculation for a student who has withdrawn



STUDENT AUTHORIZATIONS FOR TITLE IV CREDIT BALANCES

A. TITLE IV CREDIT BALANCE AUTHORIZATION:

Medtech Colleges and Institutes (Medtech) will disburse federal Title IV financial aid funds to your student account each term or payment period. If the Title IV funds exceed your allowable charges, you may choose to have Medtech retain those funds on your account to help you budget your expenses or receive a disbursement of funds. Please refer to your financial plan as a guide.

Please indicate your choice below.

_____ I authorize Medtech to retain any credit balance from federal Title IV financial aid to assist me in budgeting my expenses and apply to future charges. I also understand that I may make a written request to cancel or modify this authorization at any time and receive a disbursement of any existing credit balance.

- I understand Medtech will retain any interest earned on the credit balance while the College or Institute retains these funds.
- I understand this is a voluntary authorization and is valid from the date of signing through the date of graduation unless I cancel or modify this authorization by contacting the Student Financial aid Office.

_____ I do not authorize Medtech to retain my credit balance to be applied to future charges. Please return any credit balance remaining on my account as I indicated below.

B. RETURN OF FUNDS AUTHORIZATION:

There may be times when your student account may contain a credit balance after all charges are paid. You have the right to manage your credit balance.

_____ I authorize Medtech to return any credit balance directly to my Title IV lender to decrease my outstanding student loan balance and reduce my future monthly payment.

_____ I authorize Medtech to hold my credit balance until I have earned 100% of my federal financial aid (usually during week 7 of the term).

_____ I understand that I may rescind this authorization at any time.

_____ If I rescind this authorization and request my credit balance prior to week 7, I understand that should I withdraw from the College or Institute for any reason, I may owe a portion of the funds I receive back to Medtech and/or the U. S. Department of Education.

_____ I understand by rescinding this authorization and receiving any credit balance I may owe Medtech a portion of those funds for the following term. I have referred to my financial plan and know the approximate amount I will owe on the first day of classes.

_____ I do not authorize Medtech to retain my credit balance created by federal Title IV funds and wish to receive my Title IV credit balance within 14 days of the credit balance appearing on my account.

Student Name (print): _____ Student ID # _____

Student Signature: _____ Date: _____

Parent Signature (in the case of a PLUS Loan) _____

Return Credit Balance to: _____ student _____ parent Date: _____

[illegible]

(b)(6); (b)(7)(C)

1,076.00	1,060.00	16.00
2,249.00	2,215.00	34.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
1,110.00	1,093.00	17.00
2,775.00	2,733.00	42.00
1,418.00	1,396.00	22.00
1,390.00	1,369.00	21.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
405.00	399.00	6.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,483.00	2,445.00	38.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
1,215.00	1,196.00	19.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,602.00	2,562.00	40.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
472.00	465.00	7.00

(b)(6); (b)(7)(C)

2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,601.00	2,561.00	40.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,168.00	2,135.00	33.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,520.00	2,481.00	39.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
1,850.00	1,822.00	28.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
473.00	466.00	7.00
2,775.00	2,733.00	42.00
2,744.00	2,702.00	42.00
2,249.00	2,215.00	34.00
1,289.00	1,269.00	20.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,039.00	2,008.00	31.00
1,658.00	1,633.00	25.00
2,775.00	2,733.00	42.00
795.00	783.00	12.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
795.00	783.00	12.00
1,717.00	1,691.00	26.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00

(b)(6); (b)(7)(C)

2,775.00	2,733.00	42.00
795.00	783.00	12.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
480.00	473.00	7.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
368.00	362.00	6.00
2,775.00	2,733.00	42.00
1,830.00	1,802.00	28.00
2,775.00	2,733.00	42.00
1,137.00	1,120.00	17.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,137.00	2,104.00	33.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
1,907.00	1,878.00	29.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
1,135.00	1,118.00	17.00
2,775.00	2,733.00	42.00
741.00	730.00	11.00

(b)(6); (b)(7)(C)

[illegible]

(b)(6); (b)(7)(C)

1,425.00	1,403.00	22.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
834.00	821.00	13.00
2,775.00	2,733.00	42.00
2,009.00	1,978.00	31.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
1,973.00	1,943.00	30.00
2,775.00	2,733.00	42.00
1,152.00	1,134.00	18.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
1,110.00	1,093.00	17.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	Returned
2,775.00	2,733.00	Returned
950.00	935.00	15.00
2,775.00	2,733.00	42.00
2,273.00	2,238.00	35.00
2,775.00	2,733.00	42.00
2,592.00	2,552.00	40.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	Returned
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
1,592.00	1,568.00	24.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
728.00	717.00	9.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00
2,775.00	2,733.00	42.00

(b)(6); (b)(7)(C)

[illegible]

(b)(6); (b)(7)(C)

	2,775.00	2,733.00	42.00
	2,408.00	2,371.00	37.00
	2,775.00	2,733.00	42.00
	2,775.00	2,733.00	42.00
	2,775.00	2,733.00	42.00
	2,775.00	2,733.00	42.00
	2,775.00	2,733.00	42.00
	2,775.00	2,733.00	42.00
	2,775.00	2,733.00	42.00
	2,775.00	2,733.00	42.00
	2,775.00	2,732.00	43.00
	2,775.00	2,732.00	43.00
	2,775.00	2,732.00	43.00
	2,775.00	2,732.00	43.00
	2,775.00	2,733.00	42.00
	2,775.00	2,733.00	42.00
	2,775.00	2,732.00	43.00
	2,775.00	2,732.00	43.00
	2,775.00	2,732.00	43.00
	2,775.00	2,732.00	43.00
	2,775.00	2,732.00	43.00
	2,775.00	2,732.00	43.00
	2,775.00	2,732.00	43.00
	2,775.00	2,732.00	43.00
	925.00	911.00	14.00
	2,775.00	2,732.00	43.00
	2,775.00	2,732.00	43.00
	2,775.00	2,732.00	43.00
	2,775.00	2,732.00	43.00
	2,775.00	2,732.00	43.00
	2,775.00	2,732.00	43.00
	2,775.00	2,732.00	43.00
	2,775.00	2,732.00	43.00
	2,775.00	2,732.00	43.00
	2,775.00	2,732.00	43.00
	2,775.00	2,732.00	43.00
	2,775.00	2,732.00	43.00
	2,775.00	2,732.00	43.00
	2,775.00	2,732.00	43.00
	2,775.00	2,732.00	43.00
	2,775.00	2,732.00	43.00
	1,110.00	1,093.00	17.00
	2,775.00	2,732.00	43.00
	2,775.00	2,732.00	43.00
	2,775.00	2,732.00	43.00

[illegible]

(b)(6); (b)(7)(C)

[illegible]

(b)(6); (b)(7)(C)

[illegible]

(b)(6); (b)(7)(C)		2,775.00	2,732.00	43.00
		2,775.00	2,732.00	43.00
		2,775.00	2,732.00	43.00
		2,775.00	2,732.00	43.00
TOTALS		\$1,326,902.00	\$1,306,636.00	\$20,060.00

Appendix G

Student Name	Student SSN	GROSS Incorrect Direct Loan Award	GROSS Correct Direct Loan Award	Amount of Overaward (net after orig fee)	
(b)(6); (b)(7)(C)		\$1,750	\$1,724	\$0.00	
		\$3,000	\$2,954	\$0.00	
		\$1,750	\$1,724	\$25.87	S
		\$1,750	\$1,724	\$25.87	S
		\$3,000	\$2,954	\$45.77	
		\$3,000	\$2,954	\$45.77	
		\$1,750	\$1,724	\$25.87	S
		\$1,750	\$1,724	\$25.87	S
		\$3,000	\$2,954	\$45.77	
		\$3,000	\$2,954	\$45.77	
		\$1,750	\$1,724	\$25.87	S
		\$982	\$967	\$14.93	S
		\$3,000	\$2,954	\$45.77	
		\$1,750	\$1,724	\$25.87	S
		\$1,750	\$1,724	\$25.87	S
		\$3,000	\$2,954	\$45.77	
		\$3,000	\$2,954	\$45.77	
		\$1,750	\$1,724	\$25.87	S
		\$3,000	\$2,954	\$45.77	
		\$392	\$386	\$5.97	S
		\$3,000	\$2,954	\$0.00	
		\$1,750	\$1,724	\$25.87	S
		\$1,750	\$1,724	\$25.87	S
		\$3,000	\$2,954	\$45.77	
		\$3,000	\$2,954	\$45.77	
		\$124	\$122	\$1.99	S
		\$1,750	\$1,724	\$0.00	
		\$3,000	\$2,954	\$0.00	
		\$3,000	\$2,954	\$0.00	
		\$1,750	\$1,724	\$25.87	S
		\$3,000	\$2,954	\$45.77	
		\$1,750	\$1,724	\$25.87	S
		\$1,750	\$1,724	\$25.87	S
		\$3,000	\$2,954	\$45.77	
		\$3,000	\$2,954	\$45.77	
		\$1,750	\$1,724	\$25.87	S
		\$3,000	\$2,954	\$45.77	
		\$1,750	\$1,724	\$25.87	S
		\$1,750	\$1,724	\$25.87	S
		\$3,000	\$2,954	\$45.77	
		\$3,000	\$2,954	\$45.77	
		\$1,750	\$1,724	\$25.87	S

(b)(6); (b)(7)(C)

\$1,750	\$1,724	\$25.87	S
\$3,000	\$2,954	\$45.77	
\$3,000	\$2,954	\$45.77	
\$1,750	\$1,724	\$25.87	S
\$1,750	\$1,724	\$25.87	S
\$3,000	\$2,954	\$45.77	
\$3,000	\$2,954	\$45.77	
\$1,750	\$1,724	\$25.87	S
\$1,750	\$1,724	\$25.87	S
\$3,000	\$2,954	\$45.77	
\$3,000	\$2,954	\$45.77	
\$1,750	\$1,724	\$25.87	S
\$755	\$743	\$11.94	S
\$3,000	\$2,954	\$45.77	
\$3,000	\$2,954	\$0.00	
\$1,750	\$1,724	\$25.87	S
\$1,750	\$1,724	\$25.87	S
\$3,000	\$2,954	\$45.77	
\$3,000	\$2,954	\$45.77	
\$1,750	\$1,724	\$0.00	
\$3,000	\$2,954	\$0.00	
\$1,750	\$1,724	\$25.87	S
\$3,000	\$2,954	\$45.77	
\$1,750	\$1,724	\$25.87	S
\$1,750	\$1,724	\$25.87	S
\$1,000	\$985	\$14.92	
\$1,000	\$985	\$14.92	
\$1,163	\$1,145	\$17.91	S
\$3,000	\$2,954	\$0.00	
\$1,750	\$1,724	\$25.87	S
\$1,750	\$1,724	\$25.87	S
\$3,000	\$2,954	\$45.77	
\$3,000	\$2,954	\$45.77	
\$1,750	\$1,724	\$25.87	S
\$1,750	\$1,724	\$25.87	S
\$3,000	\$2,954	\$45.77	
\$3,000	\$2,954	\$45.77	
\$1,750	\$1,724	\$25.87	S
\$1,750	\$1,724	\$25.87	S
\$3,000	\$2,954	\$45.77	
\$3,000	\$2,954	\$45.77	
\$1,750	\$1,724	\$25.87	S
\$1,750	\$1,724	\$25.87	S
\$3,000	\$2,954	\$45.77	
\$3,000	\$2,954	\$45.77	
\$1,750	\$1,724	\$25.87	S
\$1,750	\$1,724	\$25.87	S

(b)(6); (b)(7)(C)

\$3,000	\$2,954	\$45.77	
\$3,000	\$2,954	\$45.77	
\$1,750	\$1,724	\$25.87	S
\$1,750	\$1,724	\$25.87	S
\$3,000	\$2,954	\$45.77	
\$3,000	\$2,954	\$45.77	
\$1,750	\$1,724	\$25.87	S
\$1,750	\$1,724	\$25.87	S
\$3,000	\$2,954	\$45.77	
\$3,000	\$2,954	\$45.77	
\$1,750	\$1,724	\$0.00	
\$3,000	\$2,954	\$0.00	
\$1,750	\$1,724	\$25.87	S
\$1,750	\$1,724	\$25.87	S
\$3,000	\$2,954	\$45.77	
\$3,000	\$2,954	\$45.77	
\$1,750	\$1,724	\$25.87	S
\$1,750	\$1,724	\$25.87	S
\$1,000	\$985	\$14.92	
\$1,000	\$985	\$14.92	
\$3,000	\$2,954	\$0.00	
\$1,750	\$1,724	\$25.87	S
\$1,750	\$1,724	\$25.87	S
\$3,000	\$2,954	\$45.77	
\$3,000	\$2,954	\$45.77	
\$1,750	\$1,724	\$0.00	
\$1,750	\$1,724	\$25.87	S
\$1,750	\$1,724	\$25.87	S
\$3,000	\$2,954	\$45.77	
\$3,000	\$2,954	\$45.77	
\$1,750	\$1,724	\$0.00	
\$3,000	\$2,954	\$0.00	
\$1,750	\$1,724	\$25.87	S
\$1,750	\$1,724	\$25.87	S
\$3,000	\$2,954	\$45.77	
\$3,000	\$2,954	\$45.77	
\$1,750	\$1,724	\$25.87	S
\$1,603	\$1,579	\$23.88	S
\$3,000	\$2,954	\$45.77	
\$3,000	\$2,954	\$0.00	
\$1,750	\$1,724	\$25.87	S
\$1,256	\$1,239	\$16.91	S
\$3,000	\$2,954	\$45.77	
\$984	\$969	\$14.92	S
\$1,678	\$1,652	\$25.87	
\$1,532	\$1,509	\$22.88	S
\$2,625	\$2,585	\$39.80	

(b)(6); (b)(7)(C)

	\$1,750	\$1,724	\$0.00	
	\$3,000	\$2,954	\$0.00	
	\$1,750	\$1,724	\$0.00	
	\$3,000	\$2,954	\$0.00	
	\$1,750	\$1,724	\$0.00	
	\$3,000	\$2,954	\$0.00	
	\$1,750	\$1,724	\$0.00	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$45.77	
	\$1,589	\$1,565	\$23.88	S
	\$3,000	\$2,954	\$0.00	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$2,000	\$1,969	\$30.84	
	\$2,000	\$1,969	\$30.84	
	\$1,000	\$985	\$14.92	
	\$1,000	\$985	\$14.92	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$0.00	
	\$1,750	\$1,724	\$0.00	
	\$3,000	\$2,954	\$0.00	
	\$3,000	\$2,954	\$0.00	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$1,000	\$985	\$14.92	
	\$1,000	\$985	\$14.92	
	\$5,395	\$5,313	\$79.95	P
	\$5,394	\$5,312	\$79.95	P
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$0.00	
	\$3,000	\$2,954	\$0.00	
	\$1,750	\$1,724	\$0.00	
	\$3,000	\$2,954	\$0.00	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$45.77	

(b)(6); (b)(7)(C)

\$1,750	\$1,724	\$25.87	S
\$1,750	\$1,724	\$25.87	S
\$3,000	\$2,954	\$45.77	
\$3,000	\$2,954	\$45.77	
\$569	\$560	\$8.95	S
\$3,000	\$2,954	\$0.00	
\$541	\$533	\$7.96	S
\$3,000	\$2,954	\$0.00	
\$1,750	\$1,724	\$25.87	S
\$1,750	\$1,724	\$25.87	S
\$3,000	\$2,954	\$45.77	
\$3,000	\$2,954	\$45.77	
\$1,750	\$1,724	\$0.00	
\$3,000	\$2,954	\$0.00	
\$1,750	\$1,724	\$0.00	
\$3,000	\$2,954	\$0.00	
\$1,750	\$1,724	\$25.87	S
\$1,750	\$1,724	\$25.87	S
\$3,000	\$2,954	\$45.77	
\$3,000	\$2,954	\$45.77	
\$1,750	\$1,724	\$25.87	S
\$1,750	\$1,724	\$25.87	S
\$3,000	\$2,954	\$45.77	
\$3,000	\$2,954	\$45.77	
\$1,750	\$1,724	\$25.87	S
\$1,750	\$1,724	\$25.87	S
\$3,000	\$2,954	\$45.77	
\$3,000	\$2,954	\$45.77	
\$1,750	\$1,724	\$0.00	
\$3,000	\$2,954	\$0.00	
\$1,750	\$1,724	\$25.87	S
\$1,750	\$1,724	\$25.87	S
\$3,000	\$2,954	\$45.77	
\$3,000	\$2,954	\$45.77	
\$1,750	\$1,724	\$25.87	S
\$1,750	\$1,724	\$25.87	S
\$3,000	\$2,954	\$45.77	
\$3,000	\$2,954	\$45.77	
\$1,750	\$1,724	\$25.87	S
\$1,750	\$1,724	\$25.87	S
\$3,000	\$2,954	\$45.77	
\$3,000	\$2,954	\$45.77	
\$1,750	\$1,724	\$0.00	
\$3,000	\$2,954	\$0.00	
\$1,750	\$1,724	\$25.87	S
\$1,750	\$1,724	\$25.87	S
\$3,000	\$2,954	\$45.77	
\$3,000	\$2,954	\$45.77	
\$1,750	\$1,724	\$25.87	S
\$1,750	\$1,724	\$25.87	S
\$3,000	\$2,954	\$45.77	

(b)(6); (b)(7)(C)

\$3,000	\$2,954	\$45.77	
\$1,750	\$1,724	\$25.87	S
\$1,750	\$1,724	\$25.87	S
\$3,000	\$2,954	\$45.77	
\$3,000	\$2,954	\$45.77	
\$1,750	\$1,724	\$25.87	S
\$1,750	\$1,724	\$25.87	S
\$3,000	\$2,954	\$45.77	
\$3,000	\$2,954	\$45.77	
\$1,550	\$1,526	\$23.88	S
\$3,000	\$2,954	\$0.00	
\$1,750	\$1,724	\$25.87	S
\$1,750	\$1,724	\$25.87	S
\$3,000	\$2,954	\$45.77	
\$3,000	\$2,954	\$45.77	
\$263	\$259	\$3.98	S
\$1,750	\$1,724	\$25.87	S
\$1,266	\$1,247	\$18.90	S
\$3,000	\$2,954	\$45.77	
\$3,000	\$2,954	\$0.00	
\$1,750	\$1,724	\$25.87	S
\$3,000	\$2,954	\$45.77	
\$1,750	\$1,724	\$25.87	S
\$1,750	\$1,724	\$25.87	S
\$3,000	\$2,954	\$45.77	
\$3,000	\$2,954	\$45.77	
\$1,750	\$1,724	\$25.87	S
\$1,750	\$1,724	\$25.87	S
\$1,000	\$985	\$14.92	
\$1,000	\$985	\$14.92	
\$7,500	\$7,385	\$112.12	P
\$7,500	\$7,385	\$112.12	P
\$1,750	\$1,724	\$25.87	S
\$1,750	\$1,724	\$25.87	S
\$3,000	\$2,954	\$45.77	
\$3,000	\$2,954	\$45.77	
\$1,750	\$1,724	\$25.87	S
\$1,750	\$1,724	\$25.87	S
\$3,000	\$2,954	\$45.77	
\$3,000	\$2,954	\$45.77	
\$1,750	\$1,724	\$25.87	S
\$1,532	\$1,509	\$22.88	S
\$3,000	\$2,954	\$45.77	
\$2,625	\$2,585	\$39.80	
\$1,750	\$1,724	\$25.87	S
\$1,750	\$1,724	\$25.87	S
\$3,000	\$2,954	\$45.77	

(b)(6); (b)(7)(C)

\$3,000	\$2,954	\$45.77	
\$1,750	\$1,724	\$25.87	S
\$1,750	\$1,724	\$25.87	S
\$3,000	\$2,954	\$45.77	
\$3,000	\$2,954	\$45.77	
\$1,750	\$1,724	\$25.87	S
\$1,750	\$1,724	\$25.87	S
\$1,000	\$985	\$14.92	
\$1,000	\$985	\$14.92	
\$3,472	\$3,419	\$51.67	P
\$3,471	\$3,418	\$51.67	P
\$1,750	\$1,724	\$25.87	S
\$1,750	\$1,724	\$25.87	S
\$3,000	\$2,954	\$45.77	
\$3,000	\$2,954	\$45.77	
\$1,750	\$1,724	\$0.00	
\$3,000	\$2,954	\$0.00	
\$1,750	\$1,724	\$25.87	S
\$1,750	\$1,724	\$25.87	S
\$3,000	\$2,954	\$45.77	
\$3,000	\$2,954	\$45.77	
\$1,750	\$1,724	\$25.87	S
\$1,750	\$1,724	\$25.87	S
\$3,000	\$2,954	\$45.77	
\$3,000	\$2,954	\$45.77	
\$1,750	\$1,724	\$25.87	S
\$1,750	\$1,724	\$25.87	S
\$3,000	\$2,954	\$45.77	
\$3,000	\$2,954	\$45.77	
\$1,750	\$1,724	\$25.87	S
\$1,750	\$1,724	\$25.87	S
\$3,000	\$2,954	\$45.77	
\$3,000	\$2,954	\$45.77	
\$771	\$759	\$11.94	S
\$3,000	\$2,954	\$0.00	
\$1,323	\$1,303	\$19.90	S
\$1,750	\$1,724	\$25.87	S
\$1,750	\$1,724	\$25.87	S
\$3,000	\$2,954	\$45.77	
\$3,000	\$2,954	\$45.77	
\$1,750	\$1,724	\$25.87	S
\$3,000	\$2,954	\$45.77	
\$1,750	\$1,724	\$25.87	S
\$1,000	\$985	\$14.92	
\$1,750	\$1,724	\$25.87	S
\$1,531	\$1,508	\$22.88	S
\$3,000	\$2,954	\$45.77	
\$2,623	\$2,583	\$39.80	
\$198	\$195	\$2.98	S
\$3,000	\$2,954	\$0.00	
\$1,750	\$1,724	\$25.87	S

(b)(6); (b)(7)(C)

	\$1,603	\$1,579	\$23.88	S
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$0.00	
	\$3,000	\$2,954	\$0.00	
	\$572	\$563	\$8.95	
	\$3,000	\$2,954	\$0.00	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$0.00	
	\$3,000	\$2,954	\$0.00	
	\$1,284	\$1,264	\$19.90	S
	\$3,000	\$2,954	\$0.00	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$0.00	
	\$3,000	\$2,954	\$0.00	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$1,000	\$985	\$14.92	
	\$1,000	\$985	\$14.92	
	\$3,638	\$3,582	\$54.60	P
	\$3,638	\$3,582	\$54.60	P
	\$325	\$320	\$4.97	
	\$3,000	\$2,954	\$0.00	
	\$3,000	\$2,954	\$0.00	
	\$635	\$625	\$9.95	S
	\$3,000	\$2,954	\$0.00	
	\$1,750	\$1,724	\$0.00	
	\$3,000	\$2,954	\$0.00	
	\$1,750	\$1,724	\$0.00	
	\$1,750	\$1,724	\$0.00	

(b)(6); (b)(7)(C)

	\$3,000	\$2,954	\$0.00	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$1,094	\$1,077	\$16.91	S
	\$3,000	\$2,954	\$45.77	
	\$1,875	\$1,846	\$28.85	
	\$1,750	\$1,724	\$0.00	
	\$3,000	\$2,954	\$0.00	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$0.00	
	\$3,000	\$2,954	\$0.00	
	\$1,750	\$1,724	\$25.87	S
	\$1,000	\$985	\$14.92	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$45.77	
	\$3,575	\$3,520	\$53.62	P
	\$3,574	\$3,519	\$53.62	P
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$1,000	\$985	\$14.92	
	\$1,000	\$985	\$14.92	
	\$3,575	\$3,520	\$53.62	P
	\$3,574	\$3,519	\$53.62	P
	\$1,750	\$1,724	\$0.00	
	\$3,000	\$2,954	\$0.00	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$0.00	
	\$3,000	\$2,954	\$0.00	

(b)(6); (b)(7)(C)		\$1,750	\$1,724	\$25.87	S
		\$1,750	\$1,724	\$25.87	S
		\$3,000	\$2,954	\$45.77	
		\$3,000	\$2,954	\$45.77	
		\$1,750	\$1,724	\$25.87	S
		\$1,750	\$1,724	\$25.87	S
		\$3,000	\$2,954	\$45.77	
		\$3,000	\$2,954	\$45.77	
		\$1,750	\$1,724	\$25.87	S
		\$3,000	\$2,954	\$45.77	
		\$1,750	\$1,724	\$25.87	S
		\$1,750	\$1,724	\$25.87	S
		\$3,000	\$2,954	\$45.77	
		\$3,000	\$2,954	\$45.77	
		\$1,750	\$1,724	\$25.87	S
		\$3,000	\$2,954	\$45.77	
TOTALS		\$963,919.00	\$949,300.00	\$12,194.80	

Appendix G - Continued

(b)(6); (b)(7)(C)

	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$1,148	\$1,130	\$17.91	S
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$0.00	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$1,000	\$985	\$14.92	
	\$1,000	\$985	\$14.92	

(b)(6); (b)(7)(C)

	\$2,564	\$2,525	\$38.02	P
	\$2,564	\$2,525	\$38.02	P
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$388	\$382	\$5.97	S
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	

(b)(6); (b)(7)(C)

	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$818	\$806	\$11.94	S
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$1,456	\$1,434	\$21.89	S
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$1,366	\$1,345	\$20.89	S
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$760	\$748	\$11.94	S
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$992	\$977	\$14.92	S

(b)(6); (b)(7)(C)

\$3,000	\$2,954	\$45.77	
\$1,750	\$1,724	\$25.87	S
\$1,750	\$1,724	\$25.87	S
\$3,000	\$2,954	\$45.77	
\$3,000	\$2,954	\$45.77	
\$1,750	\$1,724	\$25.87	S
\$3,000	\$2,954	\$45.77	
\$1,750	\$1,724	\$25.87	S
\$3,000	\$2,954	\$45.77	
\$3,000	\$2,954	\$45.77	
\$1,750	\$1,724	\$25.87	S
\$1,750	\$1,724	\$25.87	S
\$3,000	\$2,954	\$45.77	
\$3,000	\$2,954	\$45.77	
\$1,750	\$1,724	\$25.87	S
\$1,750	\$1,724	\$25.87	S
\$1,000	\$985	\$14.92	
\$1,000	\$985	\$14.92	
\$2,959	\$2,914	\$43.87	P
\$2,958	\$2,913	\$43.87	P
\$1,750	\$1,724	\$25.87	S
\$1,750	\$1,724	\$25.87	S
\$3,000	\$2,954	\$45.77	
\$3,000	\$2,954	\$45.77	
\$2,959	\$2,914	\$43.87	P
\$2,958	\$2,913	\$43.87	P
\$1,750	\$1,724	\$25.87	S
\$3,000	\$2,954	\$45.77	
\$1,750	\$1,724	\$25.87	S
\$1,750	\$1,724	\$25.87	S
\$3,000	\$2,954	\$45.77	
\$3,000	\$2,954	\$45.77	
\$1,750	\$1,724	\$25.87	S
\$1,750	\$1,724	\$25.87	S
\$3,000	\$2,954	\$45.77	
\$3,000	\$2,954	\$45.77	
\$569	\$560	\$8.95	S
\$1,750	\$1,724	\$25.87	S
\$1,750	\$1,724	\$25.87	S
\$3,000	\$2,954	\$45.77	
\$3,000	\$2,954	\$45.77	
\$1,750	\$1,724	\$25.87	S
\$1,750	\$1,724	\$25.87	S

(b)(6); (b)(7)(C)

	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$45.77	
	\$591	\$582	\$8.95	S
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S

(b)(6); (b)(7)(C)

	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$1,543	\$1,519	\$23.88	S
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$0.00	
	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$0.00	
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$1,000	\$985	\$14.92	
	\$1,000	\$985	\$14.92	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$1,000	\$985	\$14.92	
	\$3,575	\$3,520	\$53.62	P
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S

(b)(6); (b)(7)(C)

	\$1,750	\$1,724	\$25.87	S
	\$985	\$970	\$14.92	S
	\$984	\$969	\$14.92	S
	\$1,000	\$985	\$14.92	
	\$1,000	\$985	\$14.92	
	\$563	\$554	\$8.95	
	\$562	\$553	\$8.95	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$45.77	

(b)(6); (b)(7)(C)

\$1,750	\$1,724	\$25.87	S
\$1,750	\$1,724	\$25.87	S
\$3,000	\$2,954	\$45.77	
\$3,000	\$2,954	\$45.77	
\$1,750	\$1,724	\$25.87	S
\$1,750	\$1,724	\$25.87	S
\$3,000	\$2,954	\$45.77	
\$3,000	\$2,954	\$45.77	
\$1,750	\$1,724	\$25.87	S
\$1,750	\$1,724	\$25.87	S
\$3,000	\$2,954	\$45.77	
\$3,000	\$2,954	\$45.77	
\$1,750	\$1,724	\$25.87	S
\$1,750	\$1,724	\$25.87	S
\$3,000	\$2,954	\$45.77	
\$3,000	\$2,954	\$45.77	
\$1,750	\$1,724	\$25.87	S
\$3,000	\$2,954	\$45.77	
\$1,750	\$1,724	\$25.87	S
\$1,750	\$1,724	\$25.87	S
\$3,000	\$2,954	\$45.77	
\$3,000	\$2,954	\$45.77	
\$1,750	\$1,724	\$25.87	S
\$1,750	\$1,724	\$25.87	S
\$3,000	\$2,954	\$45.77	
\$3,000	\$2,954	\$45.77	
\$1,750	\$1,724	\$25.87	S
\$548	\$540	\$7.96	S
\$1,750	\$1,724	\$25.87	S
\$1,750	\$1,724	\$25.87	S
\$3,000	\$2,954	\$45.77	
\$3,000	\$2,954	\$45.77	
\$1,750	\$1,724	\$25.87	S
\$1,750	\$1,724	\$25.87	S
\$1,000	\$985	\$14.92	
\$1,000	\$985	\$14.92	
\$3,575	\$3,520	\$53.62	P
\$3,574	\$3,519	\$53.62	P
\$1,750	\$1,724	\$25.87	S
\$1,750	\$1,724	\$25.87	S
\$3,000	\$2,954	\$45.77	
\$3,000	\$2,954	\$45.77	
\$1,750	\$1,724	\$25.87	S
\$1,750	\$1,724	\$25.87	S
\$3,000	\$2,954	\$45.77	
\$3,000	\$2,954	\$45.77	
\$1,750	\$1,724	\$25.87	S

(b)(6); (b)(7)(C)

\$1,750	\$1,724	\$25.87	S
\$3,000	\$2,954	\$45.77	
\$3,000	\$2,954	\$45.77	
\$1,750	\$1,724	\$25.87	S
\$1,750	\$1,724	\$25.87	S
\$3,000	\$2,954	\$45.77	
\$3,000	\$2,954	\$45.77	
\$1,750	\$1,724	\$25.87	S
\$1,750	\$1,724	\$25.87	S
\$3,000	\$2,954	\$45.77	
\$3,000	\$2,954	\$45.77	
\$1,750	\$1,724	\$25.87	S
\$1,750	\$1,724	\$25.87	S
\$3,000	\$2,954	\$45.77	
\$3,000	\$2,954	\$45.77	
\$1,750	\$1,724	\$25.87	S
\$608	\$599	\$8.95	S
\$3,000	\$2,954	\$45.77	
\$1,750	\$1,724	\$25.87	S
\$1,750	\$1,724	\$25.87	S
\$3,000	\$2,954	\$45.77	
\$3,000	\$2,954	\$45.77	
\$1,750	\$1,724	\$25.87	S
\$1,750	\$1,724	\$25.87	S
\$3,000	\$2,954	\$45.77	
\$3,000	\$2,954	\$45.77	
\$1,750	\$1,724	\$25.87	S
\$1,750	\$1,724	\$25.87	S
\$3,000	\$2,954	\$45.77	
\$3,000	\$2,954	\$45.77	
\$1,750	\$1,724	\$25.87	S
\$1,750	\$1,724	\$25.87	S
\$3,000	\$2,954	\$45.77	
\$3,000	\$2,954	\$45.77	
\$1,750	\$1,724	\$25.87	S
\$1,750	\$1,724	\$25.87	S
\$1,025	\$1,009	\$15.92	
\$1,025	\$1,009	\$15.92	
\$1,750	\$1,724	\$25.87	S
\$1,750	\$1,724	\$25.87	S
\$3,000	\$2,954	\$45.77	
\$3,000	\$2,954	\$45.77	
\$1,750	\$1,724	\$25.87	S
\$3,000	\$2,954	\$45.77	
\$1,750	\$1,724	\$25.87	S
\$1,750	\$1,724	\$25.87	S
\$3,000	\$2,954	\$45.77	

(b)(6); (b)(7)(C)

\$3,000	\$2,954	\$45.77	
\$1,750	\$1,724	\$25.87	S
\$1,750	\$1,724	\$25.87	S
\$3,000	\$2,954	\$45.77	
\$3,000	\$2,954	\$45.77	
\$1,750	\$1,724	\$25.87	S
\$1,750	\$1,724	\$25.87	S
\$3,000	\$2,954	\$45.77	
\$3,000	\$2,954	\$45.77	
\$1,750	\$1,724	\$25.87	S
\$1,750	\$1,724	\$25.87	S
\$1,000	\$985	\$14.92	
\$999	\$984	\$14.92	
\$1,750	\$1,724	\$25.87	S
\$1,750	\$1,724	\$25.87	S
\$3,000	\$2,954	\$45.77	
\$3,000	\$2,954	\$45.77	
\$1,750	\$1,724	\$25.87	S
\$3,000	\$2,954	\$45.77	
\$1,750	\$1,724	\$25.87	S
\$3,000	\$2,954	\$45.77	
\$1,750	\$1,724	\$25.87	S
\$1,750	\$1,724	\$25.87	S
\$1,000	\$985	\$14.92	
\$1,000	\$985	\$14.92	
\$3,575	\$3,520	\$53.62	P
\$3,574	\$3,519	\$53.62	P
\$1,750	\$1,724	\$25.87	S
\$3,000	\$2,954	\$45.77	
\$1,750	\$1,724	\$25.87	S
\$1,750	\$1,724	\$25.87	S
\$3,000	\$2,954	\$45.77	
\$3,000	\$2,954	\$45.77	
\$1,750	\$1,724	\$25.87	S
\$1,750	\$1,724	\$25.87	S
\$1,000	\$985	\$14.92	
\$1,000	\$985	\$14.92	
\$1,750	\$1,724	\$25.87	S
\$1,750	\$1,724	\$25.87	S
\$3,000	\$2,954	\$45.77	
\$3,000	\$2,954	\$45.77	
\$1,750	\$1,724	\$25.87	S
\$1,750	\$1,724	\$25.87	S
\$3,000	\$2,954	\$45.77	
\$3,000	\$2,954	\$45.77	
\$1,750	\$1,724	\$25.87	S
\$1,750	\$1,724	\$25.87	S
\$3,000	\$2,954	\$45.77	
\$3,000	\$2,954	\$45.77	
\$1,750	\$1,724	\$25.87	S
\$1,750	\$1,724	\$25.87	S

(b)(6); (b)(7)(C)

	\$3,000	\$2,954	\$45.77	
	\$1,569	\$1,545	\$23.88	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$1,603	\$1,579	\$23.88	S
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$1,000	\$985	\$14.92	
	\$1,000	\$985	\$14.92	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$1,000	\$985	\$14.92	
	\$1,000	\$985	\$14.92	
	\$1,750	\$1,724	\$25.87	S
	\$1,616	\$1,591	\$24.87	S
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$0.00	
	\$557	\$548	\$8.95	S
	\$3,000	\$2,954	\$0.00	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$1,000	\$985	\$14.92	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S

(b)(6); (b)(7)(C)

	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	
	\$3,000	\$2,954	\$45.77	
	\$1,750	\$1,724	\$25.87	S
	\$1,750	\$1,724	\$25.87	S
	\$3,000	\$2,954	\$45.77	

(b)(6); (b)(7)(C)		\$3,000	\$2,954	\$45.77
TOTALS		\$1,270,610.00	\$1,251,357.00	\$18,936.90

Accounting Document – Prior Year Monetary Recovery (AD-PYMR)

Institution: Medtech Institute

City, State: Tucker, Georgia

PRCN: 2-2-04-27832

TIN: 582584867

DUNS: 169327033

Reviewer: Jon Finkelstein

Region: Atlanta

Date: 2/8/2013

Section A - Use if no adjustments are being made in COD

Programs	Type	Amount	Funding Code	Object Class
Federal Pell Grant (Closed AY)	Principal	20,060.00	3220RNOYR	69017
	Interest	121.00	1435RNOYR	64020
ACG	Principal		3220RNOYR	69017
	Interest		1435RNOYR	64020
National SMART	Principal		3220RNOYR	69017
	Interest		1435RNOYR	64020
FSEOG (No FISAP Corrections)	Principal		3220RNOYR	69017
	Interest		1435RNOYR	64020
FWS (No FISAP Corrections)	Principal		3220RNOYR	69017
	Interest		1435RNOYR	64020
Direct Loan and Direct Loan EAL	Principal		4253XNOYR	53020 or 53010
	Interest	409.00	4253XNOYR	53040
FFEL and FFEL EAL	Interest/ SA/EAL		4251XNOYR	53020
Federal Perkins	Principal		2915RNOYR	53054

Section B: Use if the Institution is instructed to make adjustments in COD

Add rows if necessary			Amount			G5 Program Award # *
Pell, ACG, SMART, TEACH	Program / Award Year	Principal		3875FNOYR	69020	
	Program / Award Year	Imputed Interest		1435RNOYR	64020	
Direct Loan (do not use for estimated loss)	Award Year	Principal		3875FNOYR	69020	
	Award Year	Imputed Interest		4253XNOYR	53040	

Comments:

* G5 Award # (P063P104306, first 5 digits = program, next 2 digits = award year, next 4 digits = code unique to school). Note: It is important that the year in the G5 award number correspond to the award year for which any adjustments are being made, or for which the balance has been incurred (in the case of an unsubstantiated cash or negative cash balance). If the reviewer is unsure after looking in G5, contact Susan Lewey for Pell or DL, or Tremia Haythe for FWS or FSEOG.

Example of G5 award numbers for a single school for the 2009-2010 award year, Pell vs. DL:

Pell is designated by "P063P" and DL is designated by "P268K"

P063P091445 (Pell 2009-2010 award - Pell uses the final two digits of the leading award year in the award number)

P268K101445 (Direct Loan 2009-2010 award - DL uses the final two digits of the trailing award year in the award number)

Example of G5 award number for FWS and FSEOG

FWS is designated by "P033A" and FSEOG is designated by "P007A"

P033A092121 (FWS 2009-2010 award - FWS uses the final two digits of the leading award year in the award number)

P007A092121 (FSEOG 2009-2010 award - FSEOG uses the final two digits of the leading award year in the award number)

See FPRD Distribution Form for distribution information for this form and related program review documents.

Checklist - FPRD Review	
Responsible Reviewer: Jon Finkelstein	Delivery Tracking #: 1ZA5467Y0196182841
Institution Name: Medtech Institute	
OPE ID: 03804400	PRCN: 2012-2-04-27832
Date: 2/8/2013	
Cover Letter	
✓	Letter is addressed to the correct person
✓	Letter includes certified mail information
✓	Correct standard paragraphs included
FPRD Report	
✓	Correct type of FPRD drafted (FPRD – No Further Action Required; FPRD – Further Action Required; FPRD – No Program Review Report Issued; FPRD – Closed School Loan Discharges)
✓	FPRD prepared in accordance with standard procedures
✓	Findings and Final Determinations correctly stated
✓	Citations are appropriate to the findings and cited correctly
✓	Description of each instance of noncompliance is sufficiently detailed to clearly identify the institution's regulatory violations
✓	Summary of Liabilities included with correct amounts
✓	Payment Instructions prepared correctly
✓	Student Sample Appendix is properly prepared with only first and last names and last four digits of students' SSNs
✓	Other appendices, if any, are properly prepared or enclosed as attachments
PEPS Data Entry Worksheet	
✓	PEPS Data Entry form correctly completed (including repayment method and liability amounts) Level of Review accurately reflects the deficiencies
n/a	For FPRD - No Program Review Report Issued only: Deficiency codes are appropriate to the findings
Approvals	
n/a	For FPRDs with liabilities of at least \$100,000 but less than \$1,000,000, approval obtained from OGC
n/c	For FPRDs with liabilities of \$1,000,000 or more, approval obtained from OGC and SESG General Manager
CM Signature: <i>Cis Miller</i>	Date: <i>2-8-13 2:14 PM</i>
DD Signature:	Date: